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ORIGINAL  
FILE COPY

September 1, 1993

Mr. Steve Tribble  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*David M. Falgoust*  
David M. Falgoust

Enclosures

- cc: All Parties of Record
- A. M. Lombardo
- H. R. Anthony
- R. D. Lackey

RECEIVED & FILED

22  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09428 SEP-18

FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of INTERMEDIA )	
COMMUNICATIONS OF FLORIDA, INC. )	Docket No. 921074-TP
for expanded interconnection for )	Filed: September 1, 1993
AAVs within LEC central offices )	
_____ )	

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Confidential Classification for certain Company responses to Staff's Third Set of Interrogatories dated July 28, 1993.

1. Southern Bell is filing its Request for Confidential Classification for portions of the Company's responses to Interrogatory Item Nos. 54 and 55, which contain confidential proprietary business information pursuant to section 364.183, Florida Statutes.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory responses of the information designated by Southern Bell as confidential. The information for which confidential classification is sought is intended to be and is treated by Southern Bell as private and has not been publicly disclosed.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. Appended hereto in an envelope designated as Attachment B are two edited copies of the Interrogatory responses with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing copies of the Interrogatory responses with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

5. With respect to Southern Bell's responses to Interrogatory Item No. 54, these responses contain information disclosing Southern Bell's switched access local transport recurring costs. The cost studies from which this data is derived were compiled pursuant to long run incremental costing theories and as such reflect Southern Bell's costs of providing services on a going forward basis. This information is entitled to confidential classification on the basis that it is information relating to the Company's present and future competitive interests, the public disclosure of which would impair Southern Bell's competitive position. Section 364.183(3)(a), Florida Statutes, specifically provides that such information is proprietary confidential business information that is exempt from the requirement of public disclosure under section 119.07, Florida Statutes.



6. With respect to Southern Bell's response to Interrogatory Item No. 55, these responses contain information disclosing Southern Bell's percentage of contribution derived from the switched access local transport services identified in the response. Since these contribution percentages can be used to derive the costs of switched access local transport services, this information is also proprietary. This information is entitled to confidential classification on the basis that it is information relating to the Company's present and future competitive interests, the public disclosure of which would impair Southern Bell's competitive position. Section 364.183(3)(e), Florida Statutes, specifically provides that such information is proprietary confidential business information that is exempt from the requirement of public disclosure under section 119.07, Florida Statutes.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 1st day of September, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

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JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. This information reflects data which would be valuable to present and future competitors in formulating strategic plans for entry into the local and switched access markets. Public disclosure of this information would impair Southern Bell's competitive interests. As such, this information is confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the requirement of public disclosure of Section 119.07, Florida Statutes.

The following information identified by page, line number and column is considered confidential and proprietary:

<u>Item No.</u>	<u>Page No.</u>	<u>Line No.</u>	<u>Column</u>	<u>Reason Proprietary</u>
54	1	Switched Access	1990-92	1
55	1	Switched Access	1990-92	1



**ATTACHMENT B**

**Two edited copies of the document with the confidential information deleted.**

**ATTACHMENT C**

**One copy of the document with the material which is confidential and proprietary highlighted. This information is not being provided to the parties of record.**



**CERTIFICATE OF SERVICE  
Docket No. 921074-TP**

**I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 1st day of September, 1993  
to:**

**Tracy Hatch  
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