

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5387

ORIGINAL
FILE COPY

December 7, 1993

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

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents in the 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,

Nancy B. White ^{1AB}
Nancy B. White

ACK _____
AFA 2
APP _____
CAF _____

CMU Enclosures

CTR _____ cc: All Parties of Record
EAG _____ A. M. Lombardo
LEG 1 H. R. Anthony
LIN 6 R. D. Lackey

OPC _____ RECEIVED & FILED

RCH _____
SEC 1 *[Signature]*
WAS _____
OTH K. Smith

DOCUMENT NUMBER-DATE
13013 DEC-78
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: December 7, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER

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 Division Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order for the Company's Response to Item No. 818 of Staff's Thirty-Ninth Set of Interrogatories dated November 2, 1993.

1. Southern Bell is filing its Request for Confidential Classification for its Response to Interrogatory Item No. 818 because it deems the information requested to be confidential and proprietary business information in that it reflects traffic patterns of intraLATA toll services. Since competitors who offer intraLATA toll services can use this information as a resource, disclosure of this information would impair Southern Bell's ability to compete.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory response of the information designated by Southern Bell as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the Interrogatory response with the confidential information deleted.

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

5. Regarding Southern Bell's Response to Interrogatory Item No. 818, this response is entitled to proprietary confidential classification. The data provide a blueprint of Southern Bell's route-specific intraLATA toll usage by exchange for each LATA in Florida. It contains actual and perceived traffic demand over specific toll routes. The disclosure of this highly valuable competitive toll market information would impair Southern Bell's ability to compete in the intraLATA toll market. Competitors could use the information to target the most lucrative routes. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider. The information contained in Southern Bell's Response to Interrogatory Item No. 818, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

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 7th day of December, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony, IAS
HARRIS R. ANTHONY
J. PHILLIP CARVER
c/o Marshall M. Criser
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey, IAS
R. DOUGLAS LACKEY
NANCY B. WHITE
4300 - 675 West Peachtree St.
Atlanta, Georgia 30375
(404) 529-5387

ATTACHMENT "A"
FPSC DOCKET 920260-TL
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION
STAFF'S 39TH SET OF INTERROGATORIES
ITEM 818

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. This information is mileage band and time-of-day distribution of toll minutes of use (MOU). It could be used in a competitive way by other toll providers in the marketplace because the information would provide a way to estimate market segmentation and thus a way to develop plans that would be competitive with Southern Bell's toll services. 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.

LOCATION OF PROPRIETARY MATERIAL

The following information identified by page and line numbers is considered confidential and proprietary:

<u>PAGE</u>	<u>LINE/COLUMN NO.</u>	<u>REASON</u>
Item 818, 1	25-26	1
2	5-6, 11-12, 17-18	1
3	1-25/B-M	1
4	1-25/B-M	1
5	1-25/B-M	1
6	1-25/B-M	1
7	1-25/B-M	1
8	1-25/B-M	1
9	1-25/B-M	1
10	1-25/B-M	1
11	1-25/B-M	1
12	1-25/B-M	1
13	1-25/B-M	1
14	1-25/B-M	1
15	1-25/B-M	1
16	1-25/B-M	1
17	1-25/B-M	1
18	1-25/B-M	1
19	1-25/B-M	1

ATTACHMENT "B"

Two 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.

CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 7th day of December, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
Suite 710, Barnett Bank Bldg.
315 South Calhoun Street
Tallahassee, FL 32302

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Angela Green
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Gerald B. Curington
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Whitney B. White, AS