

J. Phillip Carver
General Attorney

ORIGINAL
FILE COPY

Southern Bell Telephone
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Phone (305) 530-5558

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. 911034-TL Broward County EAS

Dear Mr. Tribble:

911034-TL

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Traffic Study in response to Order No. PSC-93-1301-FOF-TL and Request for Specified Confidential Classification, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,
J. Phillip Carver (PW)
J. Phillip Carver

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. Douglas Lackey

J.P.C.

A BELLSOUTH Company

DOCUMENT NUMBER-DATE
13015 DEC-7 93
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CERTIFICATE OF SERVICE
Docket No. 911034-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *7TH* day of *Dec.*, 1993
to:

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

Joseph A. McGlothlin
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Joseph P. Gillan
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Post Office Box 541038
Orlando, FL 32854-1038

J Phillip Carver (pm)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Request by Broward Board of) Docket No. 911034-TL
County Commissioners for extended area)
service between Fort Lauderdale,)
Hollywood, North Dade and Miami)
_____) File: 12-07-93

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR SPECIFIED 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 Specified Confidential Classification for certain information included in Southern Bell's Traffic Studies filed in the above-referenced docket.

1. On September 8, 1993, the Florida Public Service Commission ("Commission") issued Order No. PSC-93-1301-FOF-TL, which required Southern Bell to file new traffic studies. In response to the Commission's Order, Southern Bell is filing traffic studies that contain information regarding certain routes that is proprietary confidential business information. This information is comprised of Southern Bell's intraLATA traffic data regarding routes in Broward County. Since the advent of intraLATA competition on January 1, 1992, these routes have been subject to toll competition and are thus qualified for confidential treatment.

2. In accord with Rule 25-22.006, Florida Administrative Code, the information that Southern Bell considers proprietary has been highlighted for identification purposes and appended hereto as Attachment "A". Southern Bell has also appended hereto

DOCUMENT NUMBER-DATE

13015 DEC-78

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as Attachment "B" two edited copies of the traffic studies with this confidential information removed. Finally, Southern Bell has appended as Attachment "C" a listing of the page and line at which this confidential information appears.

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is entitled to confidential treatment by demonstrating how the information qualifies under one of the statutory examples designated therein. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement to indicate how Southern Bell or its ratepayers or its business operations will be harmed by public disclosure.

4. The traffic data for the routes at issue in this proceeding essentially provide a blueprint of the toll usage over these various routes. This information is maintained by Southern Bell on a proprietary and confidential basis in order that Southern Bell may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

5. Although the traffic information is clearly necessary for a full examination of the merits of the extended area service request in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. With the advent of intraLATA toll competition effective January 1, 1992, this information could now subject Southern Bell to competitive harm if it were made public.

The disclosure of such traffic patterns to the public would make available to Southern Bell's competitors highly valuable competitive information that such competitors could use to target the most lucrative routes.

6. The information for which confidential treatment is requested is intended to be and is treated as confidential by Southern Bell and has not been disclosed to the public.

WHEREFORE, Southern Bell respectfully requests that the Commission enter an order classifying the above-described traffic data as proprietary confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, that is exempt from public disclosure pursuant to Section 119.07, Florida Statutes.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

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FPSC DOCKET NO. 911034-TL
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

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

<u>Attachment</u>	<u>PAGE NOS.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
A	1	1-6	1
A-1	1	1-6	1
A-2	1	1-3	1
B	1	1-28	1
	2	1-28	1
	3	1-28	1
	4	1-28	1
	5	1-28	1
	6	1-28	1
D	1	1-6	1
	2-25	1-25	1
E	1	1-6	1
	2	1-6	1
F	1	1-6	1

Reason 1: These traffic data relate to toll usage over the various routes at issue. This is proprietary information maintained by Southern Bell on a confidential basis to plan its network deployment based on traffic demand over the respective toll routes. The disclosure of this information would allow Southern Bell's competitors in the intraLATA toll market to target the most lucrative routes and would thereby competitively harm Southern Bell.