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December 22, 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 Temporary Protective Order. 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,

Nancy B. White (BW)

Nancy B. White

Enclosures

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

RECEIVED & FILED

EPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

13659 DEC 22 83

FPSC-RECORDS/REPORTING

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 22nd day of December, 1993
to:

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Nancy B. White (pm)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: December 22, 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 the Staff's request for cost and revenue impact studies.

1. Southern Bell is filing its Request for Confidential Classification for its Response to a request by the Staff because it deems the information requested to be confidential and proprietary business information in that it reflects cost and revenue impact studies of intraLATA toll services, by specific route. 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 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 response with the confidential information deleted.

DOCUMENT NUMBER-DATE

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4. Attached as Attachment C is a sealed envelope containing one copy of the 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 the Staff's request, 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. In addition, the response provides cost and revenue impact scenarios of converting certain toll routes to Extended Calling Service and to Extended Area Service. 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. Specifically, it would allow competitors to target markets or to formulate more aggressive marketing or other strategies relating to Southern Bell's toll or operator services in Florida. 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 the Staff's request, 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 22nd day of December, 1993.

SOUTHERN BELL TELEPHONE
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ATTACHMENT "A"
FPSC DOCKET 920260-TL
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION
IMPACT STUDY

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. This information relates to competitive interests, the disclosure of which would impair Southern Bell's competitive intraLATA toll business if publicly disclosed since the toll market is competitive in the State of Florida. Specifically, this information discloses route-specific annual impact scenarios of converting certain toll routes to Extended Calling Service (ECS) and of converting these same toll routes to two-way flat rate Extended Area Service (EAS). Such impacts reflect route-specific toll volumes and the resulting conversion effects on toll revenue, FX revenue, operator toll services and toll billing for the specific toll routes studied. If disclosed, this information, could allow competitors to target markets or to formulate more aggressive marketing or other strategies relating to Southern Bell's toll or operator services in Florida.

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>
Schedule EAS-A-1 (Pages 1-3)	all data in lines 10, 11, 14, 18-20, 22-23
Schedule EAS-A-2 (Pages 1-3)	all data in lines 11-12, 15, 18, 22-24
Schedule EAS-A-3 (Pages 1-3)	all data in lines 11-12, 15, 18, 22-24
Schedule EAS-B1-1 (Pages 1-5)	all data in columns A, B, C, H
Schedule EAS-B2-1 (Pages 1-5)	all data in columns A, B, C, E, G, H
Schedule EAS-B3-1 (Pages 1-5)	all data in columns A, B, C, E, G, H