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ORIGINAL
FILE COPY

August 11, 1995

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Undocketed Matter

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Notice Regarding the Protection of Confidential Information. Please file this document in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Nancy B. White
Nancy B. White (P1)

ACK — Enclosures

AFA — cc: A. M. Lombardo

APP — R. G. Beatty

CAF — R. D. Lackey

CMU — 1

CTR —

EAG —

LEG — 1

LIN —

OPC —

RCH —

SEC — 1

WAS —

DTM — Tracy Hatch

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DOCUMENT NUMBER-DATE

07704 AUG 11 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Southern Bell Telephone)
& Telegraph Company's Tariff)
Filing to Recover the)
Implementation Costs of IntraLATA)
Presubscription)

Docket: Undocketed
Filed: August 11, 1995

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S NOTICE
REGARDING THE PROTECTION OF CONFIDENTIAL INFORMATION

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell"), to address the protection of confidential information requested by Staff.

The Staff of the Florida Public Service Commission has issued requests for information in the above mentioned matter, specifically Request No. 2, Part C and Request No. 8 (copies of the requests are attached hereto as Exhibit "A"). In these requests, Staff has requested, among other things, that Southern Bell furnish information which Southern Bell deems to be confidential business information. Southern Bell respectfully requests that the Commission and the Staff treat the subject information as confidential and proprietary.

Therefore, pursuant to Southern Bell's request and § 364.183, Florida Statutes, as amended by the Florida legislature during its 1995 session, this material requested by the Staff is exempt from § 119.07(1) of the Florida Statutes, and § 24(a), Article I of the Florida Constitution. Because of the change in § 364.183, it is not necessary for Southern Bell to file a Notice of Intent to Request Confidential Classification in order to protect the requested material from public disclosure nor is it necessary for the Commission to take any further action other than to protect the

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

information from public disclosure.

Respectfully submitted this 11th day of August, 1995.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Robert A. Beatty

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Tallahassee, Florida 32301
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R. Douglas Lackey

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Commissioners:
 SUSAN F. CLARK, CHAIRMAN
 J. TERRY DEASON
 JULIA L. JOHNSON
 DIANE K. KIESLING
 JOE GARCIA



DIVISION OF COMMUNICATIONS
 WALTER D'HAESELEER
 DIRECTOR
 (904) 413-6600

Public Service Commission

July 25, 1995

Ms. Nancy H. Sims
 Director of Regulatory Relations
 Southern Bell Telephone & Telegraph Company
 150 S. Monroe Street, Suite 400
 Tallahassee, Florida 32301-1556

RE: SBT's Tariff filing to recover the implementation costs of 1+ intraLATA
 presubscription

Dear Ms Sims:

Staff is reviewing SBT's request to recover the costs of 1+ intraLATA
 presubscription in compliance with Commission Order No. PSC-95-0203-FOF-TP. Listed
 below are questions which staff believes SBT should answer to enable staff to complete their
 analysis and make an appropriate recommendation.

1. Please provide a detailed schedule which includes the following information for each
 switch in your service area to be modified:
 - a) switch identification
 - b) Type of equipment
 - c) Software Order date
 - d) Equipment replacement plans (if replacement is required)
 - e) Proposed implementation date
 - f) Explanation for any implementation date that is later than December 31, 1997
2. Refer to Attachment C. The total costs for software are listed as \$3,553,377.93.
 - a) Provide a detailed discussion of what the software cost category represent and
 what the cost is intended to recover (e.g., RTU fees, development costs,
 engineering costs, installation costs, translations costs, etc.).

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- b) Provide a detailed breakdown of this amount into its components and identify respective costs.
 - c) If RTU fees are a part of the software costs, provide a breakdown of the RTU fees for each type of switch the Company uses in its network.
 - d) If RTU fees are included in the software costs, are they a one time fee?
 - e) If yes to part d, is the one time fee required to be paid with the initial purchase?
 - f) If no to part d, identify any other type of expense associated with the purchase of this software, including any recurring charge that must be paid to the vendor. If a recurring charge is applicable, indicate all recurring charges required by the vendor.
 - g) Does the RTU fee allow the use of the software in like switches that are located in all states that Bellsouth operates?
 - h) If yes to part f, please provide a detailed explanation of how the Company determined what portion of the RTU fee to charge to Florida.
3. Refer to Attachment C. The total costs for public relation are listed as \$2,103,576.93.
- a) Provide a detailed discussion of what the public relations cost category represents and what the cost is intended to recover (e.g., marketing materials, advertising, customer relations, etc.).
 - b) Provide a detailed breakdown of this amount into its components and identify respective costs.
4. Refer to Attachment C. The total costs for consumer services are listed as \$138,149.29.
- a) Provide a detailed discussion of what the consumer services cost category represents and what the cost is intended to recover.
 - b) Provide a detailed breakdown of this amount into its components and identify respective costs.

5. Refer to Attachment C. The total costs for Interconnection (EASC) are listed as \$299,414.54.
 - a) Provide a detailed discussion of what the interconnection (EASC) cost category represents and what the cost is intended to recover.
 - b) Provide a detailed breakdown of this amount into its components and identify respective costs.
6. Refer to Attachment C. The total costs for Comptrollers are listed as \$30,438.08.
 - a) Provide a detailed discussion of what the Comptrollers cost category represents and what the cost is intended to recover.
 - b) Provide a detailed breakdown of this amount into its components and identify respective costs.
7. Refer to Attachment C. The total costs for information technology are listed as \$486,648.90.
 - a) Provide a detailed discussion of what the information technology cost category represents and what the cost is intended to recover.
 - b) Provide a detailed breakdown of this amount into its components and identify respective costs.
8. Refer to Attachment C. Provide a breakdown of the Originating FGD MOUs (3,094,806,511) by month and category (e.g., MTS, Outwats, Inwats, etc.) for the most recent 12 month period.
9. Refer to page 36 of Commission Order PSC-95-0203-FOF-TP. The Commission required that the period for cost recovery be 3 years. However, the proposed rate shown on Attachment C of the Company's tariff filing is designed to recover its total costs over a one-year period. Provide the cost recovery rate calculation based on 3 years.
10. How does the Company propose to notify its customers regarding intraLATA presubscription? Provide any type of information, such as a bill insert or a script, that the Company proposes to utilize in order to inform customers of 1+ presubscription.

11. Under the new statutes, any LEC which elects price regulation beginning January 1, 1996 cannot charge rates for network access services which are higher than those that were in effect on July 1, 1995.
 - a) In light of the new statutes, if SBT elects price regulation and is unable to charge more for network access, does your Company believe that a new intraLATA 1+ cost recovery rate element is permissible?
 - b) If no to part a, please explain in detail why SBT believes that the new rate element is not permissible.
 - c) If yes to part a, please explain in detail why SBT believes that the new rate element is permissible.
12. Refer to the Executive Summary, page 1. The Company states that the proposed new service offerings for intraLATA Presubscription mirror the current interstate rates. Please provide a copy of the interstate access tariff pages that contains these charges.
13. Refer to Attachment A, page 3. The proposed On-Line transfer service is available when an initial selection or change in preferred intraLATA carrier is made. The Company representative will provide the end user or owner with the newly selected IXC's 800 telephone number. If the preferred IXC participates in the On-Line Transfer service, the end user or owner will have the option of being transferred directly to their preferred IXC.
 - a) Provide a more detailed explanation of this service.
 - b) What benefits does this service provide to the IXC? End user?
 - a) Section E13.3.3 G 2 (Sixth Revised Page 4) shows a proposed nonrecurring charge (\$891) and a proposed per month charge (\$500) for on Line Transfer service. What are the underlying costs for these charges? Provide a detailed breakdown of what these charges cover (e.g., labor costs, billing costs, etc.).
 - d) Section E13.3.3 E d of the proposed tariff lists specific guidelines that the IXC must follow. How does SBT plan to enforce these guidelines? What are the consequences for the IXC if these guidelines are not followed?

14. Refer to Section E13.3.3 G of the proposed tariff, sixth revised page 4. Provide a detailed breakdown of the underlying cost for the presubscription change charge (\$1.49).
15. Refer to Section E13.3.3 H of the proposed tariff, sixth revised page 4. Why are the unauthorized presubscription charges different for business or residence lines (\$19.41), and public or semi-public pay telephone lines (\$34.19)? Provide a detailed breakdown of the underlying cost for these charges.
16. Refer to Section E13.3.14 E of the proposed tariff, original page 28.1. Why are the expedited PIC switchback service charges different for business or residence lines (\$10.03), and public or semi-public pay telephone lines (\$27.08)? Provide a detailed breakdown of the underlying costs for these charges.
17. Refer to Section E13.3.15 E of the proposed tariff, original page 28.3. Provide a detailed breakdown of the underlying cost for each of the following equal access transaction services, including the cost per billed telephone number (BTN) and per working telephone number (WTN) charge.
 - a) specified due date service
 - b) customer service record information service
 - c) CIC verification
 - d) verification of pending orders that impact PIC orders
 - e) resolution of PIC discrepancies.
18. Refer to Section E13.3.16 I of the proposed tariff, original page 28.5. Provide a detailed breakdown of the underlying cost for the Data gathering through CARE element, per transaction (\$.18).
19. Refer to Section E13.3.17 G of the proposed tariff, original page 28.6. Provide a detailed breakdown of the underlying cost for the PIC in error charge (\$3.29).