

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by subscribers)
of the Groveland exchange for)
extended area service (EAS) to)
the Orlando, Winter Garden, and)
Windermere exchanges)
_____)

DOCKET NO. 941281-TL
Filed: May 20, 1996

UNITED TELEPHONE COMPANY OF FLORIDA'S
FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006, Florida Administrative Code, UNITED TELEPHONE COMPANY OF FLORIDA ("Sprint-United" or the "Company") files this Request for Specified Confidential Classification for certain information provided to the Staff in this docket, and say:

1. This request covers documents numbered 1 through 12, which are an updated traffic study that was identified at the final hearing as Late-Filed Exhibit No. 8. The documents to which this request relates were filed with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification on April 29, 1996.

2. In accordance with FPSC Rule No. 25-22.006, F.A.C., a copy of the documents with the information the Company considers to be proprietary has been filed under a separate cover as Exhibit "A" to this request and has the confidential information highlighted for identification purposes. In accordance with Rule 25-22.006, Florida Administrative Code, the Company has appended hereto as Exhibit "B" one edited copy of the confidential documents with the confidential information blacked out ("redacted").

DN 05579-96
5/20/96

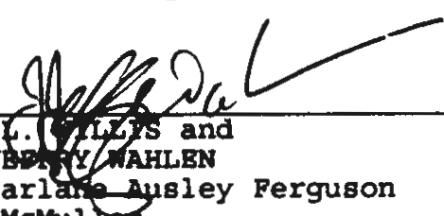
3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on the Company or its ratepayers will result from the disclosure of the information to the public. The Company has identified this confidential information on a line-by-line basis, and has appended the required line-by-line identification and justifications hereto as Exhibit "C."

4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

7. For all the foregoing reasons, Sprint-United respectfully urges the Commission to classify the above-described and discussed documents as proprietary confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Chapter 119, Florida Statutes.

WHEREFORE, UNITED TELEPHONE COMPANY OF FLORIDA moves the Commission to enter an Order declaring the documents claimed to be confidential in this request are proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 20th day of May, 1996.



LEE L. WILLYS and
J. JERRY WAHLEN
Macfarlane Ausley Ferguson
& McMullen
P. O. Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 20th day of May, 1996, to the following:

Bob Pierson *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Carroll Fulmer
Carroll Fulmer & Co., Inc.
P. O. Box 5000
Groveland, FL 34736-5000

Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Richard Wagner
304 East Colonial Drive
Orlando, FL 32801



ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by subscribers)
of the Groveland exchange for)
extended area service (EAS) to)
the Orlando, Winter Garden, and)
Windermere exchanges)

DOCKET NO. 941281-TL

EXHIBIT "B" TO SPRINT-UNITED'S FIRST
FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

Unedited Version of Late-Filed Exhibit No. 8
With
Confidential Information Redacted

UNITED TELEPHONE
DOCKET NO. 941281-TL
WITNESS: HARRELL
LATE-FILED EXHIBIT 8

Updated Traffic Study
(Confidential)

SCHEDULE I
DOCKET NO. 841281-TL
INTEREXCHANGE TRAFFIC STUDY
GROVELAND EXCHANGE TO
ORLANDO EXCHANGE
ONE-WAY

SYS STDY DESIGN
05/23/85 AS

***** UNITED PORTION ONLY *****

(A)	(B)	(C)	(D)	(E)	(F)	(G)
	AL&T	MESSAGES	CALLING RATE M/AM	TOTAL CUSTOMERS	CUSTOMERS MAKING 2 OR MORE CALLS/MONTH	NUMBER PERCENT
PART I ROUTES OVER 3 MIAM FROM: ----- TO: -----						
1.		GROVELAND		ORLANDO		

PART II
ROUTES 2.99 TO 2.00 MIAM
FROM: ----- TO: -----

PART III
ROUTES 1.99 TO 1.00 M/AM
FROM: ----- TO: -----

PART IV
ROUTES BELOW .99 M/AM
FROM: ----- TO: -----

NOTE: DATA EXCLUDES PUBLIC COIN LINES
AND ASSOCIATED MESSAGES

DATE: 05/19/95

TIME: 16:19

SUMMARY

FROM: GROVELAND
TO : ORLANDO

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

CA185A04/017

PAGE
10

INC TOLL

	<u>A</u>	<u>B</u>	<u>C</u>
	<u>RESIDENCE</u>	<u>BUSINESS</u>	<u>TOTAL</u>
1. ACCESS LINES			
2. CUSTOMERS BILLED			
3. NUMBER OF CUSTOMERS ORIGINATING 1 OR MORE MESSAGES			
4. ORIGINATING MESSAGES			
5. MESSAGE MINUTES			
6. MESSAGE REVENUE			
7. CUSTOMER USAGE 1 OR MORE MESSAGES (L3/L2)			
8. AVERAGE MESSAGES PER ACCESS LINE (L4/L1)			
9. AVERAGE MESSAGES PER CALLING CUSTOMER (L4/L3)			
10. AVERAGE MINUTES PER MESSAGE (L5/L4)			
11. AVERAGE REVENUE PER MESSAGE (L6/L4)			
12. AVERAGE MESSAGE REVENUE PER ACCESS LINE (L6/L1)			
13. AVERAGE MESSAGE REVENUE PER CALLING CUSTOMER (L6/L3)			
14. NUMBER OF CUSTOMERS ORIGINATING 2 OR MORE MESSAGES			
15. CUSTOMER USAGE 2 OR MORE MESSAGES (L14/L2)			

THIS REPORT INCLUDES TOLL TYPES: TOLL

CALL MESSAGES EXCLUDED

2

AI: 05/19/95
E: 16:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

EA185A0A/017

PAGE
1

RESIDENCE

FROM: GROVELAND
TO : ORLANDO

IXC TOLL

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	**** DAY (8-5) MESSAGES	NO DISCOUNT REVENUE	MINUTES	..EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	MINUTES	..NIGHT WEEKEND MESSAGES	DISCOUNTED REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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DATE: 05/17/95
TIME: 16:19

UNION TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

LA185A04/017

PAGE
2

RESIDENCE

FROM: GROVELAND
TO : ORLANDO

EXC TOLL

	A	B	C	D	E	F	G	H	I	J	K	L
	MESSAGES	MESSAGES	REVENUE	MINUTES	MESSAGES	REVENUE	MINUTES	MESSAGES	REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE
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IS REPORT INCLUDES TOLL TYPES: TOLL

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ATE: 05/19/95

TIME: 16:39

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

EA185A0A/017

PAGE
3

FROM: CROVELAND
TO : ORLANDO

IXC TOLL

RESIDENCE

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	*** DAY (8-5) MESSAGES	NO DISCOUNT REVENUE	MINUTES	**EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	MINUTES	**NIGHT * WEEKEND MESSAGES	DISCOUNTED REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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DATE: 05/19/95
TIME: 16:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

(A18540A/017

PAGE

6

BUSINESS

FROM: GROVELAND
TO : ORLANDO

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A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	**** DAY (8-5) MESSAGES	NO DISCOUNT REVENUE	***** MINUTES	**EVENING (5-11) MESSAGES	DISCOUNTED** REVENUE	MINUTES	**NIGHT + WEEKEND MESSAGES	DISCOUNTED** REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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THIS REPORT INCLUDES TOLL TYPES: TOLL

COIN MESSAGES EXCLUDED

DATE: 05/19/95
TIME: 16:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

EA185A0A/017

PAGE
5

BUSINESS

FROM: GROVELAND
TO : ORLANDO

EXC TOLL

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	DAY (8-5) MESSAGES	NO DISCOUNT REVENUE	MINUTES	EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	MINUTES	NIGHT MESSAGES	WEEKEND REVENUE	DISCOUNTED MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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DATE: 05/17/75
TIME: 16:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT SERVICE
03/01/75 TO 03/31/75

LA185A0A/017

PAGE
6

BUSINESS

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TO : ORLANDO

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MESSAGES	MESSAGES	REVENUE	MINUTES	MESSAGES	REVENUE	MINUTES	MESSAGES	REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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THIS REPORT INCLUDES TOLL TYPES: TOLL

MIN MESSAGES EXCLUDED

DATE: 03/19/95
TIME: 16:17

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

EA185A0A/017

PAGE
7

CHIRPED

FROM: GROVELAND
TO : ORLANDO

IXC TOLL

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	*** DAY (0-5) MESSAGES	NO DISCOUNT REVENUE	MINUTES	**EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	MINUTES	**NIGHT + WEEKEND MESSAGES	DISCOUNTED REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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DATE: 05/17/95
TIME: 16:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT SURVEY
03/01/95 TO 03/31/95

LA185A0A/017

PAGE
8

COMBINED

FROM: (CROFTLAND)
TO : ORLANDO

EXC TOLL

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	*** DAY (8-5) MESSAGES	NO DISCOUNT REVENUE	*** MINUTES	**EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	MINUTES	**NIGHT + WEEKEND MESSAGES	DISCOUNTED REVENUE	MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

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THIS REPORT INCLUDES TOLL TYPES: TOLL

118 MESSAGES EXCLUDED

TE: 05/19/95
RE: 10:19

UNITED TELEPHONE COMPANY OF FLORIDA
POINT-TO-POINT STUDY
03/01/95 TO 03/31/95

EA185A0A/017

PAGE
9

FROM: GROVELAND
TO : ORLANDO

IXC TOLL

48MINED

A	B	C	D	E	F	G	H	I	J	K	L
MESSAGES	**** DAY (0-5) MESSAGES	NO DISCOUNTED REVENUE	***** MINUTES	---EVENING (5-11) MESSAGES	DISCOUNTED REVENUE	--- MINUTES	---HIGH WEEKEND MESSAGES	DISCOUNTED REVENUE	--- MINUTES	TOTAL CUSTOMERS	TOTAL REVENUE

- 1.
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AVERAGE REVENUE PER MESSAGE
DOCKET NO. 941281-TL
ONE-WAY ROUTE ANALYSIS
CALLS ORIGINATING FROM EQUAL ACCESS OFFICES
GROVELAND EXCHANGE TO ORLANDO EXCHANGE

SYS STDY DESIGN
05/23/95 AB

(A)	(B)	(C)	(D)	(E)	(F)
ROUTE FROM: _____ TO: _____	TOTAL MESSAGES RATED BY UIC	% OF ORIGINATING CALLS FOR WHICH REVENUE INFORMATION IS AVAILABLE	AVERAGE REVENUE/MESSAGE RES BUS TOTAL		
1. GROVELAND ORLANDO					

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by subscribers)
of the Groveland exchange for)
extended area service (EAS) to)
the Orlando, Winter Garden, and)
Windermere exchanges)
_____)
_____)

DOCKET NO. 941281-TL

EXHIBIT "C" TO SPRINT-UNITED'S FIRST
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Identification and Justification

Number	Line(s)	Column(s)	Justification
1	1	B-G	Note 1
2	1-15	A-C	Note 2
3	1-60	A-L	Note 3
4	1-26	A-L	Note 3
5	1-8	A-L	Note 3
6	1-60	A-L	Note 3
7	1-17	A-L	Note 3
8	1-8	A-L	Note 3
9	1-60	A-L	Note 3
10	1-49	A-L	Note 3
11	1-8	A-L	Note 3
12	1	B-F	Note 4

Note 1: This traffic data is numbers of main stations, messages, M/A/M and percentage of customers making two or more calls, and call distribution data for the Groveland - Orlando route at issue in this docket. This data for the routes at issue in this proceeding basically provide a blueprint of the toll usage over these routes. Competition in the intraLATA toll market is increasing, and the FPSC has authorized intraLATA presubscription. If some form of an alternative toll plan is not ordered by the

Commission, Sprint-United may be subject to presubscribed competition on this route.

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. The disclosure of such traffic patterns to the public would make available to competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. This disclosure would harm the company by making sensitive traffic data available to competitors at no cost.

Note 2: This page shows the same type of traffic information discussed in Note 1, above, except broken down between business and residential customers. It shows basic statistics for access lines, number of customers, messages, message minutes and message revenues. It also shows various statistics computed using these base statistics.

This data for the routes at issue in this proceeding basically provide a blueprint of the toll usage over these routes. Competition in the intraLATA toll market is increasing, and the FPSC has authorized intraLATA presubscription. If some form of an alternative toll plan is not ordered by the Commission, Sprint-United may be subject to presubscribed competition on this route.

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. The disclosure of such traffic patterns to the public would make available to competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. This disclosure would harm the company by making sensitive traffic data available to competitors at no cost.

Note 3: This page shows the same type of traffic information discussed in Note 1, above, except broken down on a call distribution basis. It shows basic statistics for access lines, number of customers, messages, message minutes and message revenues. It also shows various statistics computed using these base statistics.

This data for the routes at issue in this proceeding basically provide a blueprint of the toll usage over these routes. Competition in the intraLATA toll market is increasing, and the FPSC has authorized intraLATA presubscription. If some form of an alternative toll plan is not ordered by the Commission, Sprint-United may be subject to presubscribed competition on this route.

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. The disclosure of such traffic patterns to the public would make available to competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. This disclosure would harm the company by making sensitive traffic data available to competitors at no cost.

Note 4: This page summarizes the same type of traffic information discussed in Notes 1, 2 and 3, above. This data for the routes at issue in this proceeding basically provide a blueprint of the toll usage over these routes. Competition in the intraLATA toll market is increasing, and the FPSC has authorized intraLATA presubscription. If some form of an alternative toll plan is not ordered by the Commission, Sprint-United may be subject to presubscribed competition on this route.

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. The disclosure of such traffic patterns to the public would make available to competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. This disclosure would harm the company by making sensitive traffic data available to competitors at no cost.

MEMORANDUM

May 20, 1996

TO: DIVISION OF APPEALS
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS
 DIVISION OF COMMUNICATIONS
 DIVISION OF ELECTRIC AND GAS
 DIVISION OF RESEARCH
 DIVISION OF WATER AND WASTEWATER
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (WILLIAMS)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO: 05580-96

DESCRIPTION: Late-filed exhibit No. 8

SOURCE: SPRINT-UNITED

DOCKET NO.: 241201-TL

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.