

SHIPPING GREEN SAMS & SMITH
PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS

FILE COPY

JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
RALPH A. DeMEO
THOMAS M. DeROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
DAVID L. POWELL
WILLIAM D. PRESTON
CAROLYN S. RAEPPEL
DOUGLAS S. ROBERTS
GARY P. SAMS
ROBERT P. SMITH
CHERYL G. STUART

123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
FAX (904) 224-8551
FAX (904) 425-3415

JAMES C. GOODLETT
GARY K. HUNTER, JR.
JONATHAN T. JOHNSON
ROBERT A. MANNING
ANGELA R. MORRISON
GARY V. PERKO
KAREN M. PETERSON
MICHAEL P. PETROVICH
LISA K. RUSHTON
R. SCOTT RUTH
JULIE R. STEINMEYER
T. KENT WETHERELL, II

Writer's Direct Dial No.
(904) 425-2313

OF COUNSEL
CARLOS ALVAREZ
W. ROBERT FOKES

November 6, 1996

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960910-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation in the above docket are the original and 15 copies of MCI's Request for Confidential Classification.

By copy of this letter this document has been provided to the parties on the attached service list.

Very truly yours,

R.D.M.

Richard D. Melson

ACK _____
AFA _____ RDM/cc
APP _____ Enclosures
C&F _____ cc: Parties of Record

CMU _____
CTR _____
EAG _____ RECEIVED & FILED
LEG _____
LIN _____ *14*
OPC _____ EPSC-BUREAU OF RECORDS

RCH _____
SEC _____ 1 81436.1

WAS _____
OTH *all Matilla*

RAR note: 2 versions of Attachment A were filed... highlighted and un-highlighted. Unhighlighted version was returned to Mr. Melson 11/7/96.

14

DOCUMENT NUMBER-DATE

11875 NOV-6 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Recommendation to require)
applicable LECs to reduce their)
switched access charges by five)
percent annually, pursuant to)
Section 364.163(6), Fla. Stat.)
_____)

Docket No. 960910-TP
Filed: November 6, 1996

**MCI TELECOMMUNICATIONS CORPORATION'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

MCI Telecommunications Corporation (MCI) hereby requests confidential classification of certain data required by the Commission in Order No. PSC-96-1265-FOF-TP (Order), issued in this docket on October 8, 1996. The data constitutes proprietary confidential business information of MCI pursuant to Section 364.183, Florida Statutes, and should therefore be afforded confidential classification pursuant to Rule 25-22.006, Florida Administrative Code.

I. Summary of Confidential Information

The Order requires applicable local exchange companies to reduce switched access charges effective October 1, 1996. The Order also requires interexchange carriers to reduce long distance rates effective October 1, 1996, and to calculate the estimated savings to its Florida intrastate operations. In response to this ruling, enclosed is a calculation of MCI's dollar reduction in intrastate access charges and the related service-by-service rate reductions. Some of the data contained in this attachment constitutes proprietary confidential business information of MCI pursuant to Section 364.183, Florida Statutes,

and MCI requests that such information be afforded confidential treatment. The information for which confidentiality is requested consists of LEC-specific information regarding MCI's switched access minutes of use and service-specific information regarding MCI's rate reductions, including data on minutes of use and revenue impact.

II. Justification for Confidential Classification

In accordance with Sections 350.121 and 364.183, Florida Statutes, as well as Rule 25-22.006, Florida Administrative Code, the previously described information should be classified as confidential information and afforded appropriate protection from public disclosure. The material relates to the competitive activities of MCI and provides LEC-specific and service-specific information, not otherwise available to MCI's competitors, regarding MCI's intrastate Florida traffic volumes.

(1) Page 2, Column A.

Column A on page 2 shows MCI's monthly average switched access minutes of use by LEC., and Column D shows the monthly reduction in switched access charges based on the difference between the old rate (Column B) and the new rate (Column D). These minutes relate to a period during which the Florida intrastate interexchange market has become increasingly competitive, with numerous new firms entering the market, with existing firms increasing their marketing efforts to retain customers or lure them from other carriers, and with a multitude of new service offerings and marketing approaches. Public

disclosure of the information contained in Column A would provide MCI's competitors with information on MCI's total traffic volumes in each LEC territory in Florida, and with information on MCI's success in penetrating the intrastate market in each of those territories. This information is not generally available in the market, and its disclosure would provide MCI's competitors with information to gauge the success of MCI's marketing efforts during the period in question. This information constitutes proprietary confidential business information of MCI which is entitled to protection from public disclosure pursuant to Section 364.183, Florida Statutes. In particular, such information constitutes "trade secrets" of MCI pursuant to Section 364.183(3)(a), Florida Statutes, and also constitutes information "relating to competitive interests, the disclosure of which would impair the competitive business" of MCI under Section 364,183(3)(e). The information is intended to be and is treated by MCI as private, and is not disclosed to persons outside MCI except under limited circumstances in which the confidentiality of the information can be protected. MCI derives independent economic value from such information not generally being known, and MCI's competitors could obtain economic value for the disclosure and use of such information.

(2) Page 2, Columns D, E and F.

Column D on page 2 shows MCI's monthly reduction in switched access charges based on the difference between the old access charge rates (Column B) and the new rates (Column D). Column E

simply recaps the monthly access charge reduction information in Column D, while Column F converts the monthly information to an annual basis. Public disclosure of the information contained in either Column D, E, or F, combined with the public information in Columns B and C, would enable one to calculate the confidential information contained in Column A. As shown above, that data is entitled to protection from public disclosure pursuant to Section 364.183, Florida Statutes.

(3) Page 3, Columns A and B.

Columns A and B on page 3 show the total amount of MCI's rate reductions on a service-specific basis. Public disclosure of this information, if combined with the public information contained on pages 4 through 7 regarding cent-per-minute rate reductions by service, would enable one to calculate the total volume of traffic for each MCI service to which a rate reduction was made. Because this information is presented on a service-by-service basis, it is even more sensitive than the LEC-specific information on page 2. Public disclosure of this information would enable MCI's competitors to determine the relative success of MCI's various service offerings, and to craft market responses to take advantage of MCI's experience. This information is likewise subject to protection under both subsections (3)(a) and (3)(e) of Section 364.183, Florida Statutes.

(4) Page 4, Rows Entitled "Minutes" and "Revenue Impact".

The rows entitled "minutes" contain information on MCI's monthly traffic volumes on a service-specific basis. The rows

entitled "revenue impact" contain information which, in combination with other non-confidential information on the page, can be used to calculate such service-specific traffic volumes. The information in these rows is entitled to confidential classification for the same reasons detailed in Paragraphs (1) and (3), above.

- (5) Pages 5-7, Rows Entitled "Monthly Revenue Decrease," "Usage," "Discount," and "Net."

Each of these rows contain information which, in combination with other non-confidential information on the same page, can be used to calculate service-specific traffic volumes. The information in these rows is entitled to confidential classification for the same reasons detailed in Paragraphs (1) and (3), above.

III. Duration of Confidentiality

Because of the dynamic nature of competition in the intrastate long distance market in Florida, MCI is unable to provide a date by which the material contained in this response would no longer be proprietary and confidential.

IV. Return of Information

MCI requests that this confidential information be returned to it after the Commission has verified compliance with the Order.

V. Conclusion

In accordance with the provisions of Rule 25-22.006, Florida Administrative Code, the requested information has been provided

in two forms. Attachment A is a copy of the information on which the proprietary information has been highlighted and is submitted in a separate sealed envelope labeled "CONFIDENTIAL." This version, which contains the complete information, should be classified as confidential for the reasons set forth above. Attachment B is a redacted version which contains only the non-proprietary information. Copies of this version have been served on the parties of record to this docket.

RESPECTFULLY SUBMITTED this 6th day of November, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson
Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
(904) 425-2313

and

MARTHA MCMILLIN
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342
(404) 843-6375

ATTORNEYS FOR MCI

**MCI Supporting Documentation
Docket No. 960910-TL
Access Flow Through Filing Effective October 1, 1996**

Estimated Annual Access Reduction Impact to MCI **\$8,580,269.00**

Annual Rate Reductions

Consumer and Small Business	\$3,182,225.00
Business Services	\$5,398,044.00

MCI CONFIDENTIAL

LEC: BellSouth

	(A)	(B)	(C)	(D)
<u>Element</u>	<u>Average Minutes</u>	<u>Old Rate</u>	<u>New Rate</u>	<u>Monthly Impact</u>
Orig CCL	XXXXX	0.010610	0.010000	(\$XXXXX)
Term CCL	XXXXX	0.029270	0.018530	(\$XXXXX)

=====
LEC: GTE

<u>Element</u>	<u>Average Minutes</u>	<u>Old Rate</u>	<u>New Rate</u>	<u>Monthly Impact</u>
RIC	XXXXX	0.0134362	0.0102496	(\$XXXXXX)

=====
LEC: Centel

<u>Element</u>	<u>Average Minutes</u>	<u>Old Rate</u>	<u>New Rate</u>	<u>Monthly Impact</u>
RIC	XXXXX	0.021037	0.017333	(\$XXXXXX)

=====
LEC: United

<u>Element</u>	<u>Average Minutes</u>	<u>Old Rate</u>	<u>New Rate</u>	<u>Monthly Impact</u>
RIC	XXXXX	0.013997	0.010824	(\$XXXXXX)

	(E) <u>MONTHLY</u>	(F) <u>ANNUALLY</u>
BellSouth	(\$XXXXXX)	(\$XXXXXX)
GTE	(\$XXXXXX)	(\$XXXXXX)
Centel/United	(\$XXXXXX)	(\$XXXXXX)
TOTALS	(\$715,182.12)	(\$8,582,185.42)

MCI CONFIDENTIAL

(A)

MONTHLY

(B)

ANNUALLY

MCI Vision

(\$XXXXXX)

(\$XXXXXX)

MCI Vnet

(\$XXXXXX)

(\$XXXXXX)

MCI 800

(\$XXXXXX)

(\$XXXXXX)

MCI Commercial Dial 1

(\$XXXXXX)

(\$XXXXXX)

MCI Dial 1

(\$XXXXXX)

(\$XXXXXX)

MCI Card

(\$XXXXXX)

(\$XXXXXX)

TOTALS

(\$715,272.00)

(\$8,580,269.00)

FL-FLOW

Florida - Flow Thru Rate Reduction

Vision - Outbound				Vision - Outbound				Vision - Outbound				Vision Power Rate				Vision Power Rate				Vision Power Rate - Peak				Vision Power Rate - Off Peak							
Interlata		SW		Interlata		Ded		Interlata		Card		Interlata		SW		Interlata		SW		Interlata		SW		Interlata		SW					
Old Rates	0.2070			Old Rates	0.1260			Old Rates	0.2355			Old Rates	0.1850			Old Rates	0.1379			Old Rates	0.2229			Old Rates	0.1338			Old Rates	0.1271		
New Rates	0.1925			New Rates	0.1197			New Rates	0.2237			New Rates	0.1758			New Rates	0.1324			New Rates	0.2115			New Rates	0.1271			New Rates	0.1271		
Difference	-7%			Difference	-5%			Difference	-5%			Difference	-5%			Difference	-4%			Difference	-5%			Difference	-5%			Difference	-5%		
Minutes				Minutes				Minutes				Minutes				Minutes				Minutes				Minutes				Minutes			
Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact			
Vision - Outbound				Vision - Outbound				Vision - Outbound				Vision Power Rate				Vision Power Rate				Vision Power Rate - Peak				Vision Power Rate - Off Peak							
Interlata		SW		Interlata		Ded		Interlata		Card		Interlata		Ded		Interlata		Ded		Interlata		SW		Interlata		SW					
Old Rates	0.1600			Old Rates	0.1250			Old Rates	0.2355			Old Rates	0.1121			Old Rates	0.1076			Old Rates	0.1662			Old Rates	0.1034			Old Rates	0.0993		
New Rates	0.1488			New Rates	0.1188			New Rates	0.2237			New Rates	0.1065			New Rates	0.1022			New Rates	0.1596			New Rates	0.0993			New Rates	0.0993		
Difference	-7%			Difference	-5%			Difference	-5%			Difference	-5%			Difference	-5%			Difference	-4%			Difference	-4%			Difference	-4%		
Minutes				Minutes				Minutes				Minutes				Minutes				Minutes				Minutes				Minutes			
Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact				Rev Impact			
Vision - Inbound 800 (Vision)				Vision - Inbound 500 (Vision)				Interlata Power Rate				Interlata Power Rate																			
SW				Ded				Card				Card																			
Old Rates	0.2260			Old Rates	0.1386			Old Rates	0.1850			Old Rates	0.1379																		
New Rates	0.2147			New Rates	0.1317			New Rates	0.1758			New Rates	0.1320																		
Difference	-5%			Difference	-5%			Difference	-5%			Difference	-4%																		
Minutes				Minutes				Minutes				Minutes																			
Rev Impact				Rev Impact				Rev Impact				Rev Impact																			
VNET				VNET																											
Business Day				Business Day																											
Switched- Switched				Switched- Switched																											
Interstate	1st 18	Add'l 6	Min. Rt.	Intrastate	1st 18	Add'l 6	Min. Rt.																								
Old Rates	0.0698	0.0233	0.2329	Old Rates	0.0540	0.0180	0.1800																								
New Rates	0.0663	0.0221	0.2213	New Rates	0.0513	0.0171	0.1710																								
Difference	-5%	-5%	-5%	Difference	-5%	-5%	-5%																								
Minutes				Minutes																											
Rev Impact				Rev Impact																											
Non Business Day				Non Business Day																											
Switched- Switched				Switched- Switched																											
Interstate	1st 18	Add'l 6	Min. Rt.	Intrastate	1st 18	Add'l 6	Min. Rt.																								
Old Rates	0.0612	0.0204	0.2040	Old Rates	0.0492	0.0164	0.1640																								
New Rates	0.0581	0.0194	0.1938	New Rates	0.0467	0.0156	0.1558																								
Difference	-5%	-5%	-5%	Difference	-5%	-5%	-5%																								
Minutes				Minutes																											
Rev Impact				Rev Impact																											
MCI 800 Switched				MCI 800 Dedicated																											
Day	Eve	Night	Avg. Rate	Day	Eve	Night	Avg. Rate																								
Old Rates	0.2487	0.2421	0.2482	Old Rates	0.1502	0.1267	0.0821																								
New Rates	0.2372	0.2300	0.2358	New Rates	0.1427	0.1204	0.0875																								
Change	-5%	-5%	-5%	Change	-5%	-5%	-5%																								
Minutes				Minutes																											
Revenue Impact				Revenue Impact																											

MCI CONFIDENTIAL

Florida Access Flow Through for Dial-1 and Card

Dial-1 Interlata

 Estimated Effective Date: 10/07/96
 Customer Notification: none required
 Monthly Revenue Decrease: (\$XXXXXX)

	Monthly	96
Usage	(\$XXXXXX)	(\$XXXXXX)K
Disc	(\$XXXXXX)	(\$XXXXXX)
Net	(\$XXXXXX)	(\$XXXXXX)K

COLLAPSED RATES PER MINUTE

FLORIDA
Dial 1

	DAY	EVE	N/WE	AVG	
MCI Current Collapsed Rates	0.2471	0.1882	0.1541	0.1942	Average Effective RPM
MCI Proposed Collapsed Rate	0.2411	0.1822	0.1481	0.1882	Average Effective RPM

PROPOSED MCI RATES
EFF. DATE:

	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.1939	0.1939	0.1439	0.1439	0.1139	0.1139
11-22	0.2039	0.2039	0.1539	0.1539	0.1239	0.1239
23-55	0.2339	0.2339	0.1739	0.1739	0.1339	0.1339
56-124	0.2439	0.2439	0.1839	0.1839	0.1439	0.1439
125-292	0.2439	0.2439	0.1839	0.1839	0.1539	0.1539
293-430	0.2439	0.2439	0.1839	0.1839	0.1539	0.1539
431+	0.2439	0.2439	0.1839	0.1839	0.1539	0.1539

CURRENT MCI RATES

Dial 1 InterLATA Rates

	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.1999	0.1999	0.1499	0.1499	0.1199	0.1199
11-22	0.2099	0.2099	0.1599	0.1599	0.1299	0.1299
23-55	0.2399	0.2399	0.1799	0.1799	0.1399	0.1399
56-124	0.2499	0.2499	0.1899	0.1899	0.1499	0.1499
125-292	0.2499	0.2499	0.1899	0.1899	0.1599	0.1599
293-430	0.2499	0.2499	0.1899	0.1899	0.1599	0.1599
431+	0.2499	0.2499	0.1899	0.1899	0.1599	0.1599

MCI CONFIDENTIAL

Dial-1 Intralata Rates

Estimated Effective Date: 10/07/96

Customer Notification: none required

Monthly Revenue Reduction: (\$XXXXXX)

}		monthly	96
	Usage	(\$XXXXXX)	(\$XXXXXX)
	Discount	(\$XXXXXX)	(\$XXXXXX)
	Net	(\$XXXXXX)	(\$XXXXXX)

FLORIDA

COLLAPSED RATES PER MINUTE

Dial 1

	DAY	EVE	N/WE	AVG
MCI Current Collapsed Rates	0.2080	0.1259	0.1249	0.1505
MCI Proposed Collapsed Rate	0.0999	0.0999	0.0999	0.0999

PROPOSED MCI RATES

EFF. DATE:

	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
11-22	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
23-55	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
56-124	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
125-292	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
293-430	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999
431+	0.0999	0.0999	0.0999	0.0999	0.0999	0.0999

CURRENT MCI RATES

Dial 1 Intrastate Rates

	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.1799	0.1799	0.1259	0.1259	0.1099	0.1099
11-22	0.1999	0.1999	0.1259	0.1259	0.1199	0.1199
23-55	0.2099	0.2099	0.1259	0.1259	0.1259	0.1259
56-124	0.2099	0.2099	0.1259	0.1259	0.1259	0.1259
125-292	0.2099	0.2099	0.1259	0.1259	0.1259	0.1259
293-430	0.2099	0.2099	0.1259	0.1259	0.1259	0.1259
431+	0.2099	0.2099	0.1259	0.1259	0.1259	0.1259

MCI CONFIDENTIAL

Card Rates

Estimated Effective Date: 10/07/96

Customer Notification: none required

Monthly Revenue Reduction: (\$XXXXX)

}		Monthly	96
	Usage	(\$XXXXX)	(\$XXXXX)
	Discount	(\$XXXXX)	(\$XXXXX)
	Net	(\$XXXXX)	(\$XXXXX)

COLLAPSED RATES PER MINUTE

CARD

	DAY	EVE	N/WE	AVG	

MCI Current Collapsed Rates	0.4270	0.3039	0.2914	0.3482	Average Effective RPM
MCI Proposed Collapsed Rates	0.4041	0.2851	0.2713	0.3275	Average Effective RPM

PROPOSED MCI RATES

EFF. DATE:	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.1699	0.1699	0.1199	0.1199	0.0999	0.0999
11-22	0.1899	0.1899	0.1399	0.1399	0.1099	0.1099
23-55	0.2199	0.2199	0.1599	0.1599	0.1199	0.1199
56-124	0.2399	0.2399	0.1599	0.1599	0.1299	0.1299
125-292	0.2499	0.2499	0.1699	0.1699	0.1299	0.1299
293-430	0.2499	0.2499	0.1799	0.1799	0.1399	0.1399
431-624	0.2499	0.2499	0.1799	0.1799	0.1399	0.1399
Surcharge per call	0.7400		0.7400		0.7400	

CURRENT MCI RATES

	CARD Intrastate Rates					
	DAY		EVE		NIGHT	
	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN	1ST MIN	ADDL MIN
1-10	0.1799	0.1799	0.1299	0.1299	0.1099	0.1099
11-22	0.1999	0.1999	0.1499	0.1499	0.1199	0.1199
23-55	0.2299	0.2299	0.1699	0.1699	0.1299	0.1299
56-124	0.2499	0.2499	0.1699	0.1699	0.1399	0.1399
125-292	0.2599	0.2599	0.1799	0.1799	0.1399	0.1399
293-430	0.2599	0.2599	0.1899	0.1899	0.1499	0.1499
431-624	0.2599	0.2599	0.1899	0.1899	0.1499	0.1499
Surcharge per call	0.7900		0.7900		0.7900	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by hand delivery this 6th day of November, 1996.

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

Nancy B. White
BellSouth Telecommunicatins
675 West Peachtree St., Room 4300
Atlanta, GA 30375

Martha Brown
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Martha Brown
Division of Legal Services
Room 370
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Benjamin W. Fincher
Sprint Communications
3100 Cumberland Circle #802
Atlanta, GA 30339

Ben Poag, Director
United/Centel
Post Office Box 2214 M/C 2565
Tallahassee, FL 32316-2214

Tim O. Mc

Attorney

M E M O R A N D U M

November 6, 1996

TO: ___ DIVISION OF APPEALS
 ___ DIVISION OF AUDITING AND FINANCIAL ANALYSIS
 XX 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 (SANDERS)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO.: 11876-96

DESCRIPTION: Information in response to Order

PSC-96-1265-FOF-TP.

SOURCE: MCI Telecommunications Corporation

DOCKET NO.: 960910-TP

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.
- ___ The utility has provided enough details to perform a reasoned analysis of its request.
- ___ The material has been received incident to an inquiry.