

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth)
Telecommunications, Inc. Entry Into) DOCKET NO. 960786-TL
InterLATA Services Pursuant to)
Section 271 of the Federal) FILED: August 21, 1997
Telecommunications Act of 1996)

INTERMEDIA COMMUNICATIONS INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Intermedia Communications Inc. (Intermedia), hereby files pursuant to Rule 25-22.006, Florida Administrative Code, its Request for Confidential Classification, and states the following:

1. On July 31, 1997, BellSouth Telecommunications, Inc. (BellSouth) filed its response to the Subpoena Duces Tecum served by the Florida Public Service Commission (Commission) Staff upon BellSouth on July 25, 1997. On July 31, 1997, BellSouth also filed a Notice of Intent to Request Confidential Classification for the subject information. BellSouth informed Intermedia that the information contained therein pertained to customer-specific information of Intermedia. On July 31, 1997, Intermedia filed a Notice of Intent to Request Confidential Classification as well.

2. Staff's Interrogatory No. 31 requests BellSouth to reveal the specific requests and numbers for requests for trunking facilities Intermedia has requested from BellSouth. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to estimate the amount of traffic being transported over Intermedia's network.

3. Interrogatory No. 31 also requests BellSouth to reveal

DOCUMENT NUMBER-DATE
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the specific area and location where Intermedia has its trunks, as well as information relating to trunk size, the number of trunks in service, and the number of trunks forecasted. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets where Intermedia conducts its business and estimate Intermedia's market penetration.

4. Staff's Interrogatory No. 43 requests BellSouth to reveal the specific services Intermedia resells of BellSouth. Moreover, the information contains the numbers of resold services in each specific area in Florida. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets and number of customers and volume where Intermedia conducts its business.

5. Staff's Interrogatory No. 68 requests BellSouth to describe the specific location where Intermedia has customers. Moreover, this information identifies the number and volume of customers in specific regions and percent penetration in that specific market area. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets and numbers of customers and volume where Intermedia conducts its business.

6. Attachment "A" to this Request identifies the page and

line at which the confidential material is found, and correlates the page and line with the specific justification for confidential classification of the information.

7. Two copies of the information with the confidential information redacted are attached hereto as Attachment B.

8. One highlighted copy of the information with the material which is confidential and proprietary is attached hereto in a sealed envelope as Attachment C.

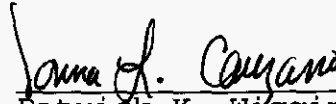
9. The information for which Intermedia seeks confidential classification is not publicly available. Intermedia has treated and intends to continue to treat the material for which confidential classification is sought as private, confidential information and this information has not been disclosed to the public.

WHEREFORE, based on the foregoing, Intermedia respectfully requests that the Commission enter an order declaring that the declaring the information described above to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 21st day of August, 1997.

INTERMEDIA COMMUNICATIONS INC.

By:



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Its Attorneys

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail, hand delivery* and/or Federal Express** this 21st day of August, 1997, to the following:

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Donna L. Canzano

ATTACHMENT A

ATTACHMENT A

PAGE	LINES	COLUMN	RATIONALE
Item 31, p.2 Item 31, p.4	2-8 3-7	All C-D	This information contains proprietary and confidential business information. The information relates to specific requests and numbers for requests for trunking facilities Intermedia has requested from BellSouth. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to estimate the amount of traffic being transported over Intermedia's network. Pursuant to Section 364.183, Florida Statutes, the information thus is exempt from the disclosure requirements of Section 119.07, Florida Statutes.
Item 31, p.7 Item 31, p.7	4-14 15	A, C-G F-G	This information contains proprietary and confidential business information. This information found in columns A, and C-H relate to the specific area and location where Intermedia has its trunks, as well as information relating to trunk size, the number of trunks in service, and the number of trunks forecasted. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets where Intermedia conducts its business and estimate Intermedia's market penetration. Pursuant to Section 364.183, Florida Statutes, the information thus is exempt from the disclosure requirements of Section 119.07, Florida Statutes.

Item 43, p. 1A	3-34	C-F	This information contains proprietary and confidential business information. This information found in column C describes the specific services Intermedia resells of BellSouth. Moreover, the information found in Columns D-F contain the numbers of resold services in each specific area in Florida. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets and number of customers and volume where Intermedia conducts its business. Pursuant to Section 364.183, Florida Statutes, the information thus is exempt from the disclosure requirements of Section 119.07, Florida Statutes.
Item 43, p.2A	2-12	C-F	

ITEM 68, ATTACHMENT C

5	5	A, C-H	This information contains proprietary and confidential business information. The information in column A describes the specific location where Intermedia has customers. Moreover, the information found in columns C-H identify the number and volume of customers in specific regions and percent penetration in that specific market area. This information directly relates to Intermedia's competitive interests. Disclosure of this information would impair the competitive business of Intermedia by allowing competitors to determine the specific markets and numbers of customers and volume where Intermedia conducts its business. Pursuant to Section 364.183, Florida Statutes, the information thus is exempt from the disclosure requirements of Section 119.07, Florida Statutes.
5	7	A, C-H	
6	5	A	
6	6	C-H	
7	5-6	A, C-H	
8	5	A, C-H	
10	5	A, C-H	
13	5	A	
13	6	C-H	
14	5,7	A	
14	6-7	C-H	
15	5-7	A, C-H	
16	5	A, C-H	
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16B	1	A	
16B	2	C-H	
17	5	A	
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19	5	A, C-H	
19	6	A	
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23	5	A	
23	6	C-H	
24	5	A	
24	6	C-H	
24A	1	A	
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27	1	A, C-H	
28	5	A	
28	6	C-H	
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31	5	A, C-H	
31	6	A	
31	7	C-H	
32	5	A, C-H	
33	5-6	A, C-H	
33	7	A	
33	8	C-H	
34	1-2	A, C-H	
35	5	A	
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35	7, 10	A, C-H	
36	1	A	
36	2	C-H	
36	3	A, C-H	
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38	2	A	
38	3	C-H	
39	5	A	
39	6	C-H	

ATTACHMENT B

REQUEST: Has BellSouth received any requests for access to unbundled network elements (UNEs) as defined by FCC and FPSC's orders?

a. If the answer is yes, please list the following information for each entity that has requested access to UNEs.

- (i) the name of the entity who made the request,
- (ii) each element requested by the entity; and
- (iii) the point of interconnection requested by the entity for each element.

RESPONSE: BellSouth has received numerous requests for access to unbundled network elements.

a.(i)

ICI (Intermedia Communications Inc.)

OK

a.(ii)

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Item 31,
Pg. 4

Interconnection by cust by lrk

	A	B	C	D
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5	ICF	ICI (INTERMEDIA COMMUNIC. INC.)		
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7	ICF	ICI (INTERMEDIA COMMUNIC. INC.)		

2 ALEC Trunks - Sorted By ALECs (07-01-97)

3	A	B	C	D	E	F	G	H
3	AREA	CXR	LOC A	LOC Z	TRUNK TYPE	TRKS IN SVC	TRKS FCST	POI
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5		ICF						Z
6		ICF						A
7		ICF						A
8		ICF						A
9		ICF						A
10		ICF						A
11		ICF						Z
12		ICF						A
13		ICF						A
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3	R7149	ICI (Intermedia Communications, Inc.)				
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ATTACHMENT C

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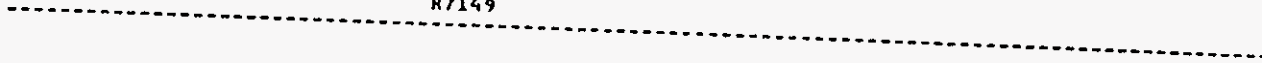
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