

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for confidential ) DOCKET NO. 900500-TL  
classification of material provided in )  
response to staff's audit of pay ) ORDER NO. 25057  
telephone operations by Southern Bell )  
Telephone and Telegraph Company. ) ISSUED: 9/12/91  
\_\_\_\_\_ )

ORDER REGARDING CONFIDENTIAL CLASSIFICATION

Southern Bell Telephone and Telegraph Company (Southern Bell or "the company") has requested confidential classification of certain information contained in 64 items of material obtained by the Commission during its audit of the company's coinless pay telephone operations. Southern Bell requests confidential classification of information that falls into four categories. Each of these categories is discussed in the body of this Order. Because of the number of documents involved in Southern Bell's request, however, specific rulings on each document appear in Appendix I to the Order.

There is a presumption in the law of Florida that documents submitted to governmental agencies shall be public records. This presumption is based on the concept that government should operate in the "sunshine" and that the public has a right to see the documents government bases its decisions on. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to specific terms of a statutory provision. Exemptions to the public policy in favor of disclosure are to be narrowly construed and, if a doubt exists as to the applicability of an exemption, it is to be resolved in favor of disclosure rather than secrecy.

Pursuant to section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, the company requesting confidential classification must show that the material in question contains bona fide proprietary confidential business information. It must identify the material in sufficient detail to permit a reasoned analysis and must provide specific justification. Rule 25-22.006(c) provides that the company must demonstrate how the information asserted to be confidential qualifies as one of the statutory examples set out in section 364.183(3). If no statutory example is applicable, the company must explain how disclosure will cause harm to the ratepayers or the company's business operations. The burden to demonstrate that the information is proprietary business information is upon the company requesting it.

DOCUMENT NUMBER-DATE  
09112 SEP 12 1990  
FPSC-RECORDS/REPORTING

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 2

It is noted at the outset that since the time Southern Bell submitted its request for confidential classification, much of the information that is the subject of the request has been made public record by the Department of Legal Affairs. Because the information is already in the public domain, the company agrees that it should not be granted confidential classification.

As to the remaining information, the first category of material for which confidential classification is requested is information the company terms "customer specific." It includes the names, or the addresses, or the telephone numbers (or some combination of that information) of the company's pay telephone location providers. Southern Bell claims this information is exempt from disclosure under section 119.07(3)(x), Florida Statutes. That section provides an exemption from the Public Records Act for the following material:

All records supplied by a telecommunications company to a state or local governmental agency which contain the name, address, and telephone number of subscribers ...

Southern Bell asserts that these providers "could be described as subscribers or are analogous to subscribers." "Subscriber" is defined by the Commission in Rule 25-4.003(44), Florida Administrative Code:

"Subscriber." "Customer." These terms may be used interchangeably herein and shall mean any person, firm, partnership, corporation, municipality, cooperative organization, or governmental agency supplied with communication service by a telephone company.

Southern Bell pays its location providers commissions in exchange for the providers' supplying Southern Bell with locations to place pay telephones. They are not subscribers or customers within the meaning of the Commission's rule; thus, the exemption in section 119.07(3)(x) does not apply to these records.

---

<sup>1</sup>Many of the documents for which Southern Bell claims an exemption contain only a name or telephone number of one or more providers. Southern Bell does not make any argument that the word "and" in section 119.07(3)(x) should be interpreted as "or" so that documents containing less than a name, address, and telephone number would be exempt. Because I conclude that pay telephone

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 3

Southern Bell also asserts that records containing location provider identifying information should be classified as confidential because disclosure would allow its pay telephone competitors to target the specific location provider listed in the documents. Southern Bell has not demonstrated in any detail how its business operations will be harmed by disclosure. Simple observation of the pay telephones reveals the information and it is not clear how disclosure through these documents will cause harm to Southern Bell's business operations.

The burden to show that material contains proprietary confidential business information is on Southern Bell. It must be specific in supporting its arguments with the reasons justifying non-disclosure and it cannot expect the Commission to speculate about the harm that disclosure may cause it. Southern Bell has not adequately justified confidential classification of the identity of its pay telephone location providers. Accordingly, the documents claimed to be proprietary confidential business information because they may identify a pay telephone location provider shall not be exempt from the requirements of Section 119.07(1), Florida Statutes.

The second category of material for which Southern Bell requests confidential classification is comprised of certain contractual data, including the commission rates paid to the owners of property on which the company places its pay telephones. The company asserts that this information is proprietary confidential business information because it would impair its efforts to contract for space on favorable terms. Other pay telephone providers, it claims, could use the commission information to win bids from property owners.

Section 364.183(3)(d), Florida Statutes, provides that proprietary confidential business information includes information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company to contract for services on favorable terms. The information for which Southern Bell requests confidential classification is the actual pay telephone location provider contract commission rates and category data. To the extent this information has not been previously disclosed, it is proprietary confidential business information which is exempt from the requirements of section 119.07(1), Florida Statutes.

---

location providers are not subscribers, it is unnecessary to address this question.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 4

The third category of material is computer system security information describing, on a step-by-step basis, how to enter and move through the computer program containing pay telephone commission and customer information. Southern Bell relies on section 364.183(3)(c), Florida Statutes, claiming the material to be a security measure, system, or procedure that is exempt from the Public Records Act. Additionally, the company claims it could be harmed by a computer hacker using the information to steal or destroy the pay telephone commission data or to learn its collection schedule and methods. I find that this information is also proprietary confidential business information and it is exempt from disclosure.

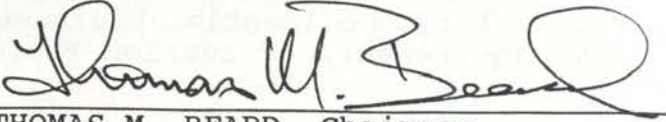
The last category of material for which confidential classification is requested is internal audit information. Section 364.183(3)(b) includes as an example of proprietary confidential business information "internal auditing controls and reports of internal auditors." Under Rule 25-22.006, Florida Administrative Code, data extracted from confidential material for inclusion in working papers is also confidential. Because the information contains the Commission auditor's notes taken from Southern Bell's internal audit work papers, they will be classified as confidential.

In consideration of the foregoing, it is

ORDERED by Chairman Thomas M. Beard, as Prehearing Officer, that the request for specified confidential classification filed by Southern Bell Telephone and Telegraph on July 12 1990, is granted in part and denied in part pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, as specified in Appendix I of this Order.

ORDERED that the information that is classified as confidential shall be confidential for a period of 18 months from the date of this order.

By ORDER of Chairman Thomas M. Beard, as Prehearing Officer, this 12th day of SEPTEMBER, 1991.

  
THOMAS M. BEARD, Chairman

( S E A L )  
CTM

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 5

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.59(4), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: 1) reconsideration within 10 days pursuant to Rule 25-22.038(2), Florida Administrative Code, if issued by a Prehearing Officer; 2) reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or 3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or sewer utility. A motion for reconsideration shall be filed with the Director, Division of Records and Reporting, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 6

APPENDIX I

Attachment B to Southern Bell's request provides justification for 64 documents. Each document is listed and discussed in order as a separate item below, followed by the title of the work paper or document and the work paper number. The Division of Records and Reporting has also assigned document numbers to the attachments. Items 1 through 62 comprise Document No. 6161, item 63 is assigned Document No. 1626, and item 64, magnetic tapes, is assigned Document No. 1625 and Document No. 5300-90. The rationale for these decisions appears in the body of this order.

-----  
ITEM 1, REVIEW OF PRACTICES. Work Paper 17-1, page 2, lines 1 and 2. Request denied. This information has been previously disclosed.

ITEM 2, DOCUMENT LIST RE PAYPHONE INVESTIGATION. Work Paper 23-1, page 10, line 1; page 12, line 1. Request denied. This information has been disclosed.

ITEM 3, SOUTHERN BELL FLORIDA OPERATIONS INTERNAL REVIEW OF PUBLIC COMMUNICATIONS AND COMMISSIONS. Work Paper 25-10: page 1, lines 1,2, and 3. Request granted. The information classified as confidential is contract commission rates and the marketing categories paying those rates. It is exempt under section 364.183(3)(d), Florida Statutes.

Page 7, lines 1 - 11. Request denied. This information has been previously disclosed.

ITEM 4, REVENUE - COIN TELEPHONE SETTLEMENTS COMMISSION RATE STRUCTURE. Work Paper 44, lines 1 - 8, all data except column and row headings; lines 9 - 13, all numerals except dates. Request denied. This information has been disclosed.

ITEM 5, MAJOR AND STRATEGIC CONTRACT ACCOUNT COMMISSION REFUND REVIEW. Work Paper 45-1. Request denied for the information in the columns labelled Major Account Name, Account Name, and Group Bill Numbers. The data for which confidential classification is requested pertains only to a pay telephone location provider, not a subscriber. The secondary claim that Southern Bell's competitors can target specific customers is not adequately justified and it is not clear how disclosure of the information will harm its business operations. Moreover, the information pertaining to Florida location providers has been previously disclosed.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 7

The highlighted numbers in the unlabelled column between the columns labelled "3553-B's Reviewed" and "Refund" on the following pages and lines contain commission rates paid to non-governmental agencies, and they will be classified as confidential: page 9, line 18; and page 10, lines 4, 6, and 8.

Request denied for the remaining information because it has been previously disclosed.

ITEM 6, ACCOUNTS REVIEWED BY COMPANY - NOT APPEARING ON MAJOR AND STRATEGIC LISTING. Work Paper 45-1B. Request denied. This information has been disclosed.

ITEM 7, TOTAL # OF MAJOR AND STRATEGIC ACCOUNTS. Work Paper 45-1A. Request denied. Section 119.07(3)(x), Florida Statutes, exempts certain records of subscribers. The data for which confidential classification is requested pertains only to pay telephone location providers, not subscribers. The secondary claim that Southern Bell's competitors can target specific customers is not adequately justified and it is not clear how disclosure of the information will harm its business operations. Moreover, with the exception of the information on page 7, lines 2 - 25, and page 8, line 30, the information has been previously disclosed.

ITEM 8, NORTH FLORIDA PREVIOUS CONTRACTS NOT REVIEWED. Work Paper 45-1/1-1. Request denied. This information has been previously disclosed.

ITEM 9, PREVIOUS PAYMENTS MADE. Work Paper 45-1/2. Request denied. This information has been previously disclosed.

ITEM 10, CURRENT CONTRACT LISTING. Work Paper 45-2. Request for confidential classification denied for the information highlighted in the columns labelled "agent material location", "company agent address", and "group bill number". This information has been previously disclosed.

Request granted for the information listed in the columns labelled "B.O.C. Rate" and "Minutes of Use Rate" on the following pages and lines: page 1, lines 1 - 28; page 2, lines 1 - 38; page 3, lines 1 - 27; page 4, lines 1 - 8; page 5, lines 1 - 26; page 6, lines 1 - 21; page 7, lines 1 - 36; page 8, lines 1 - 16; page 9, lines 1 - 16. The information that will be classified as confidential is contract commission rates, disclosure of which would impair the efforts of the company to contract for pay telephone placement on favorable terms. It is exempt under section 364.183(3)(d), Florida Statutes.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 8

ITEM 11, REVIEW OF SELECTED REFUND AMOUNTS. Work Paper 45-3. Request denied. This information has been previously disclosed.

ITEM 12, AMOUNT RECALCULATION 1987 - 1989. Work Paper 45-3/1. Page 1, lines 1, 2, 5 and 6; page 2, lines 1 and 2. Request denied. This information has been previously disclosed.

Request granted as to information in the column labelled "Correct Commission Rates" on page 1, lines 3, 4, and 7-18; and on page 2, lines 3 - 14. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 13, REVIEW OF (CUSTOMER NAME) CURRENT 3552B'S. Work Paper 45-3/1, page 2. Request denied for information on lines 1, 2, and 4. This information has been previously disclosed.

Request granted for information on lines 3 and 5 - 9 in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 14, EXPIRED CONTRACTS. Work Paper 45-3/1-1. Request denied. This information has been previously disclosed.

ITEM 15, EXPIRED CONTRACTS. Work Paper 45-3/1-2. Request denied. This information has been previously disclosed.

ITEM 16, ACCOUNT RECALCULATION 1988-1989. Work Paper 45-3/2. Request denied for information on lines 1, 2, 6, and 7. This information has been previously disclosed.

Request granted for information on lines 3, 4, 5, and 8 in the column labelled "Correct Commission Rates" and the information in the left column in lines 9 - 11. The information that will be classified as confidential is contract commission rate data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 17, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B'S. Work Paper 45-3/2. Request denied for the information on lines 1, 2, and 6. This information has been previously disclosed.

Request granted for information on lines 3 and 7 in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates, disclosure



ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 9

of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 18, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/4, page 1. Request denied for information on lines 1 - 3, 6, and 7. This information has been previously disclosed.

Request granted for information on lines 4, 5, 8, and 9 in the column labelled "Correct Commission Rates"; and the percentage and cents amounts on lines 10 - 12. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 19, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B'S. Work Paper 45-3/4, page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for information on line 4 in the column labelled "Correct Commission Rates", and for the dollar amount in line 4. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 20, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/5, page 1. Request denied for the information on lines 1, 2, 4, and 5. This information has been previously disclosed.

Request granted for information on lines 3, 6, and 7 in the column labelled "Correct Commission Rates"; and for the percentage and dollar amounts on lines 8 and 9. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 21, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552'S. Work Paper 45-3/5. Request denied for the information on lines 1, 2, and 4. This information has been previously disclosed.

Request granted for information on line 3, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission information, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 22, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/6, page 1. Request denied for the information on lines 1, 2, 8 and 9. This information has been previously disclosed.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 10

Request granted for information on lines 3 - 7, and 10 - 14, in the column labelled "Correct Commission Rates"; and the percentage amounts, dollar amounts, and rate category name in lines 15 - 17. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 23, REVIEW OF (CUSTOMER NAME) CURRENT 3552B'S. Work Paper 45-3/6, Page 2. Request denied for the information on line 1, 2, 4, and 6. This information has been previously disclosed.

Request granted for information on lines 3, 5, and 7, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 24, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/7, Page 1. Request denied for the information on lines 1, 2, 15 and 16. This information has been previously disclosed.

Request granted for information on lines 3 -14 and 17 - 28, in the column labelled "Correct Commission Rates"; and the percentage amounts, dollar amounts, and category name in lines 29 - 31. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 25, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B'S. Work Paper 45-3/7, page 2. Request denied for information on lines 1 and 2. This information has been previously disclosed.

Request granted for information on line 3, in the column labelled "Correct Commission Rates"; and the percentage amount and dollar amount in line 4. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 26, DETAIL OF PUBLIC TELEPHONE SETTLEMENT FOR COMBINED DRAFT. Work Paper 45-3/7-1. Request denied for the information on line 1 of pages 1 - 4; and the information in the columns labelled "Account Number", "Name", and the unlabelled column on the far right containing addresses on pages 1 - 4. This information has been previously disclosed.

Request granted for information in columns labelled "CM %", and "CTS MIN" on the following pages and lines: page 1, lines 2 - 50;

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 11

page 2, lines 2 - 50; page 3, lines 2 - 50; and page 4, lines 2 -8. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 27, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/8. Request denied. This information has been previously disclosed.

Request granted for the percentage amounts, dollar amounts, and category name in lines 2, 4, and 5. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 28, REVIEW OF (CUSTOMER NAME) - MOST CURRENT 3552B's. Work Paper 45-3/8 page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for information on line 3, in the column labelled "Correct Commission Rates"; and the information on line 4. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 29, ACCOUNT RECALCULATION 1989. Work Paper 45-3/9, page 1. Request denied for information on line 1 and 3. This information has been previously disclosed.

Request granted for the category name, percentage amounts, and dollar amounts on lines 2, 4, and 5. The information that will be classified as confidential is contract commission data that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 30, REVIEW OF (CUSTOMER NAME) - MOST CURRENT 3552B'S. Work Paper 45-3/9, page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for the information on line 3, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 31, DETAIL OF PUBLIC TELEPHONE SETTLEMENT FOR COMBINED DRAFT (FORM 3552-B). Work Paper 45-3/9-1. Request denied for the information on line 1, and the information in the columns labelled account number, name, and the unlabelled column on the far right containing addresses on lines 2 - 31. This information has been previously disclosed.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 12

Request granted for information on lines 2 - 31, in the columns labelled "CM %" and "CTS MIN". The information that will be classified as confidential is contract data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 32, ACCOUNT RECALCULATION 1989. Work Paper 45-3/10, page 1. Request denied for the information on lines 1 and 3. This information has been previously disclosed.

Request granted for the percentage amounts, dollar amounts, and category name on lines 2, 4, and 5. The information that will be classified as confidential is contract data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 33, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B'S. Work Paper 45-3/10, page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for information on line 3, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 34, ACCOUNT RECALCULATION. Work Paper 45-3/11, page 1. Request denied for the information on lines 1 and 3. This information has been previously disclosed.

Request granted for the percentage amounts and dollar amounts on lines 2 and 4. The information that will be classified as confidential is contract commission rates and it is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 35, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B's. Work Paper 45-3/11, page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for the information on line 3, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is contract commission rates and it is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 36, DETAIL OF PUBLIC TELEPHONE SETTLEMENT FOR COMBINED DRAFT (FORM 3552-B). Work Paper 45-3/11-1. Request denied for the information on line 1 and the information on lines 2 - 42 in the columns labelled "Account Number", "Name", and the unlabelled

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 13

column at the right containing addresses.

Request granted for information on lines 2 - 42, in the columns labelled "CM %" and "CTS MIN"; and the information on lines 43 - 46. The information that will be classified as confidential is contract data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 37, EXPIRATION OF CONTRACT. Work Paper 45-3/11-2. Request denied. This information has been previously disclosed.

ITEM 38, ACCOUNT RECALCULATION 1988, 1989. Work Paper 45-3/12. Request denied for the information on lines 1 and 3. This information has been previously disclosed.

Request granted for the percentage amounts, dollar amounts, and category name on lines 2, 4, and 5. The information that will be classified as confidential is contract commission rates that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 39, REVIEW OF (CUSTOMER NAME) MOST CURRENT 3552B'S. Work Paper 45-3/12, page 2. Request denied for the information on lines 1 and 2. This information has been previously disclosed.

Request granted for the information on line 3, in the column labelled "Correct Commission Rates". The information that will be classified as confidential is a contract commission rate that is exempt under section 364.183(3)(d), Florida Statutes.

ITEM 40, CUSTOMER CONTACT. Work Paper 45-3/13, pages 1 - 3. Request denied. This information has been previously disclosed.

ITEM 41, PCIS (Public Communication Information Systems) INTERNAL CONTROLS. Work Paper 45-5/1, pages 1 and 2. Request denied. This information has been previously disclosed.

ITEM 42, PRINTOUT OF REFUND METHODOLOGY PROGRAM. Work Paper 47-1. Request denied. This information has been previously disclosed.

ITEM 43, PRINTOUT OF REFUND METHODOLOGY PROGRAM. Work Paper 47-2. Request denied. This information has been previously disclosed.

ITEM 44, AVERAGE REVENUES 7/86 - 12/88. Work Paper 48-5. Request denied. This information has been previously disclosed.

ITEM 45, PERCENT ACTUAL REVENUE OF AVERAGE REVENUE. Work Paper 48-5/1. Request denied. This information has been previously

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 14

disclosed.

ITEM 46, PCIS INTERNAL CONTROLS. Work Paper 45-5/1-1, second page. Request denied. This information has been previously disclosed.

ITEM 47, BROWARD COUNTY - PCIS REPORTS (AVERAGE) 3/3/87. Work Paper 58-4. Request denied. This information has been previously disclosed.

ITEM 48, BROWARD COUNTY - PCIS REPORTS (AVERAGE) 3/11/88. Work Paper 58-5. Request denied. This information has been previously disclosed.

ITEM 49, REQUEST FOR PROPOSALS. Work Paper 59. Request denied. This information has been previously disclosed.

ITEM 50, UNIVERSITY OF MIAMI PROPOSAL. Work Paper 59-1. Except as noted in the following paragraph, the request is denied. This information has been previously disclosed.

Request granted for information on page 29, lines 5 and 6; on page 30, lines 2, 3, and 5 - 13; on page 31, lines 2 - 22, in the columns labelled "CM %" and "CTS MIN"; the percentage and dollar amounts on lines 24-29, page 31; on page 32, lines 2 - 50, in the columns labelled "CM %" and "CTS MIN"; and page 33, lines 6 - 9. The information that will be classified as confidential is contract data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 51, BOC REVENUE AND INTERLATA MINUTES OF USE. Work Paper 59-1/1. Request denied. This information has been previously disclosed.

ITEM 52, (CUSTOMER NAME) CONTRACT. Work Paper 59-1/2. Request denied. This information has been previously disclosed.

ITEM 53, PUBLIC COMMUNICATIONS ACCOUNT MANAGER ASSIGNMENTS. Work Paper 59-5. Request denied. This information has been previously disclosed.

ITEM 54, REVIEW OF INTERNAL AUDITS. Work Paper 9-1, pages 1 - 4. Request granted. The information on page 2, lines 1 - 4 that will be classified as confidential is internal audit information that is proprietary pursuant to section 364.183(3)(b), Florida Statutes.

ITEM 55, REVIEW OF INTERNAL AUDITS. Work Paper 9 - 2, pages 1 - 10. Request granted. The information on the following pages and

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 15

lines is proprietary because it is the results and conclusions from the company's internal audit work papers and reports: page 1, lines 1 - 6; page 2, lines 1 - 22; page 3, lines 1 - 13; page 4, lines 1 - 16; page 5, lines 1 - 15; page 6, lines 1 - 5; page 7, lines 1 - 3; page 9, lines 1 - 5.

ITEM 56, REVIEW OF INTERNAL AUDIT. Work Paper 9-3, pages 1 - 4. Request granted. The information on page 1, lines 1 - 13; page 2, lines 1 - 5; page 3, lines 1 - 20; and page 4, lines 1 - 3 will be classified as confidential because it summarizes the results of the company's internal audits and is proprietary business information pursuant to section 364.183(3)(b), Florida Statutes.

ITEM 57, REVIEW OF INTERNAL AUDITS. Work Paper 9-4. Request granted. The information on lines 1 and 2 of this one-page document will be granted confidential classification because it summarizes the results of an internal audit.

ITEM 58, REVIEW OF INTERNAL AUDITS. Work Paper 9-5, pages 1 and 2. Request granted. The information on page 1, lines 1 - 19; and page 2, lines 1 - 22 is proprietary because it summarizes the results of an internal audit.

ITEM 59, REVIEW OF COOPERS & LYBRAND WORK PAPERS. Work Paper 9-6, pages 1 - 15. Request granted. The information on page 1, lines 1 - 34; page 7, lines 1 - 29; page 8, lines 1 - 36; page 9, lines 1 - 7; page 10, lines 1 - 3; and page 11, lines 1 - 5 will be classified as confidential pursuant to section 364.183(3)(b), Florida Statutes. It is a summary of the results of an internal audit although it was performed by an external auditing firm.

ITEM 60, COMPENSATION PLAN 1988. Work Paper 44-1. Request granted. The information on the following pages and lines will be classified as confidential because it is contractual data, disclosure of which would impair the efforts of the company to contract for services on favorable terms: page 1, lines 1 - 6; page 2, lines 1 and 2; page 3, lines 1 - 8; page 4, lines 1 - 8; page 5, lines 1 - 7; page 6, lines 1 - 3; page 7, lines 1 - 4; and page 12, lines 1 - 8.

ITEM 61, PCIS INTERNAL CONTROL. Work Paper 45-5/3. Request granted. The information on each of the numbered lines on all 26 pages of this document will be classified as confidential under section 364.183(3)(c), Florida Statutes. This document is a printout of screens for the company's Public Communications Information System. Disclosure of this information would reveal the means to access confidential contractual data.

ORDER NO. 25057  
DOCKET NO. 900500-TL  
PAGE 16

ITEM 62, FPSC AUDIT REPORT AS OF MAY 23, 1990 (PUBLIC TELEPHONE AUDIT). Request denied for the information on page 22, lines 1 and 2, and page 27, lines 1, 2, and 3 - 11. This information has been previously disclosed.

Request denied for the information on page 24, lines 1 - 3. It is unclear how the disclosure of the total revenue classes for these markets will harm the company.

Request granted for information on page 20, lines 1 - 21. The information that will be classified as confidential is contract commission rates, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

ITEM 63, HYPOTHESIS TEST PROGRAM FROM REFUND METHODOLOGY. DOCUMENT NO. 1626. Request denied. This information has been previously disclosed.

ITEM 64, PUBLIC COMMUNICATIONS INFORMATION SYSTEM MAGNETIC TAPE. DOCUMENT NOS. 1625 AND 5300-90. Request denied for data fields entitled "Station ID", "Telephone Number", and "Billing Telephone Number". This information has been previously disclosed.

Request granted for the data fields entitled "Type-of-Station", "Station-Status", "Territorial-Assign-Plan", "Sector-SIC", "Market-SIC", "SIC-Literal", "Market-Account-Code", and "Voucher-Account-Code". This information will be classified as confidential because it is contractual data, disclosure of which would impair the efforts of the company to contract for services on favorable terms.

Request granted for the data field "Station-Stop". Because this information provides coin collection stop details, it will be classified as confidential pursuant to section 364.183(3)(c), Florida Statutes. This section provides that security measures, systems, or procedures are proprietary confidential business information.