

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Establishment of  
Intrastate Implementation  
Requirements Governing Federally  
Mandated Deregulation of Local  
Exchange Company Payphones.

DOCKET NO. 970281-TL  
ORDER NO. PSC-98-0322-CFO-TL  
ISSUED: February 24, 1998

ORDER GRANTING BELLSOUTH TELECOMMUNICATIONS'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF DOCUMENT NOS. 11091-97 AND 11149-97

Pursuant to Rule 25-22.006(4), Florida Administrative Code, BellSouth Telecommunications, Inc., (BellSouth or the company) requested confidential treatment for certain information. The information in question is contained in Document Nos. 11091-97 and 11149-97. The information located in Document No. 11091-97 is identical to the information located in Document No. 11149-97.

Florida law presumes that documents submitted to governmental agencies shall be public records. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to the specific terms of a statutory provision. This presumption is based on the concept that government should operate in the "sunshine." Rule 25-22.006(4), Florida Administrative Code, provides that it is the company's burden to demonstrate that the documents fall into one of the statutory examples set out in Section 364.183, Florida Statutes, or to demonstrate that the information is proprietary confidential information, the disclosure of which will cause the company or its ratepayers harm.

Section 364.183(3), Florida Statutes, provides the following definition for proprietary confidential business information:

The term 'proprietary confidential business information' means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless

DOCUMENT NUMBER-DATE

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disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. The term includes, but is not limited to:

- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

Rule 25-22.006(4)(c), Florida Administrative Code, requires that the company demonstrate by a line-by-line or field-by-field justification how the information asserted to be confidential qualifies as one of the statutory examples listed in section 364.183(3), Florida Statutes. If no statutory example is applicable, then the company shall include a statement explaining how the ratepayers or the company's operations will be harmed by disclosure.

Specifically, BellSouth seeks confidential treatment for portions of the documents as specified in Attachments A, B, and C to this Order. The documents are separated into three parts. Attachment A corresponds to the first part; Attachment B corresponds to the second part; and Attachment C corresponds to the third part. The company asserted in its request for confidential treatment that the information requested is confidential and proprietary business information that reflects vendor specific prices as well as revenue and cost data. The information is also confidential because BellSouth strives to keep the information from being disclosed. In describing how disclosure of revenue and cost information could harm the company, BellSouth contends that competitors who will offer comparable services can use revenue and

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cost information when determining how best to enter the telecommunications market. Disclosure of long run incremental cost information for providing service would allow competitors to determine the rate below which BellSouth could not provide service. Some of the information for which BellSouth seeks confidential treatment is a result of negotiations between the company and its vendors. The company asserts that disclosure of this information would impair its ability to contract for goods and services on a favorable basis.

BellSouth's argument is persuasive. Pursuant to Rule 25-22.006(4), Florida Administrative Code, the company has met its burden to demonstrate that the documents meet the statutory definition of confidential proprietary business information, the disclosure of which will cause the company harm. For this reason BellSouth's request for confidential classification is granted.

Based on the foregoing, it is therefore,

ORDERED by Commissioner Susan F. Clark, as Prehearing Officer, that BellSouth Telecommunications Inc.'s Request for Confidential Classification for Document Nos. 11091-97 and 11149-97 is granted as set forth in the body of this Order. It is further

ORDERED that pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, any confidentiality granted to the documents specified herein shall expire eighteen (18) months from the date of issuance of this Order in the absence of a renewed request for confidentiality pursuant to Section 364.183. It is further

ORDERED that this Order will be the only notification by the Commission to the parties concerning the expiration of the confidentiality time period.

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By ORDER of Commissioner Susan F. Clark, as Prehearing Officer, this ~~24th~~ day of February, 1998.



SUSAN F. CLARK  
Commissioner and Prehearing Officer

( S E A L )

AED

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), 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 wastewater 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.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**ATTACHMENT A**

**FPSC DOCKET 970281-TL**

**PAYPHONE SERVICES COST STUDIES**

**Explanation of Proprietary Information**

A. This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

B. This information reflects vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
5	Column A, Lines 10, 11, 19, 20 All under Columns B, C, D, E, F, G, H	A
7	Line 6, Cols. B-E, H,I	A
8	Lines 112-149, 152,153,155, Cols. D,F,H	A
9	Lines 12-50, Cols. D,F,H	A
10	Lines 62-99, Cols. D,F,H	A
11	Lines 157,159-160, Cols F,H	A
12	Lines 112-149, 152,153,155, Cols. D,F,H	A
13	Lines 12-50, Cols. D,F,H	A
14	Lines 62-99, Cols. D,F,H	A
15	Lines 157,159-160, Cols F,H	A
16	Lines 112-149, 152,153,155, Cols. D,F,H	A
17	Lines 12-50, Cols. D,F,H	A
18	Lines 62-99, Cols. D,F,H	A
19	Lines 157,159-160, Cols F,H	A
20	Lines 112-149, 152,153,155, Cols. D,F,H	A
21	Lines 12-50, Cols. D,F,H	A
22	Lines 62-99, Cols. D,F,H	A
23	Lines 157,159-160, Cols F,H	A
24	Lines 3-35, Cols. F,H	A
25	Lines 3-35, Cols. F,H	A
26	Lines 3-35, Cols. F,H	A
27	Lines 3-35, Cols. F,H	A
28	Lines 9,10,11,24,25,26,39,40,41,54,55,56, Col. J Lines 14,15,16,21,28,29,30,31,36,44,45,46, 51,58,59,60,61,66, Col. J	B A
29	Lines 9,10,11,24,25,26, Col. J Lines 14,15,16,21,28,29,30,31,36, Col. J	B A
30	Lines 11,12,14,19,20,22,27,28,30,35,36,38, 43,44,46,51,52,54, Col. J Lines 9,10,17,18,25,26,33,34,41,42,49,50, Col. J	A B
31	Lines 14,15,16,17,18,21, Col. J Lines 22-25, Col. J	B A
32	Lines 7,8,10,11,19-21, Cols. A-D	A
38	Lines 7-51,56-58, Cols D,G	A
39	Lines 7-72, Cols. C,E	A
45	Lines 9,10, Col. J	B



46	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35, Col. J	B
47	Lines 53,55,57,59, Col. J	B
48	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35,37,39,41,43, Col. J	B
49	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35, Col. J	B
50	Lines 1-8, 11-14, 19, 25, 27-29, Cols. B-G	B
51	Lines 1-8, 11-14, 19, 25-29, Cols. B-E	B
53	Lines 6-7, Col. C	A
55	Lines 26-38, Col. C	A
56	Lines 6,9,11,16-17, 23-37, 41-43, Col. C	A
59	Columns A,B,C,G, Lines 1,3	A
59	Columns A,B,C,D,F,G, Lines 2,4	A
59	Columns A,C,D,F,G, Lines 5	A
60	Column A, Lines 2,4	A
61	Column A, Lines 2,4,14-15,20,23-24	A
62	Column A, Lines 2,4	A
63	Column A, Lines 1,3,6,9	A
63	Column B, Line 13	A
63	Column C, Line 15	A
63	Columns B,C, Line 16	A
63	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
63	Column A, Lines 35,37,39	A
64	Column A, Lines 1,3,6,9	A
64	Column B, Line 13	A
64	Column C, Line 15	A
64	Columns B,C, Line 16	A
64	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
64	Column A, Lines 35,37,39	A
65	Column A, Lines 2-5	A
65	Column A, Lines 8-10	B
65	Column A, Lines 13,14	A
65	Column A, Lines 18-22	B
65	Column A, Lines 24-26	A
65	Column A, Lines 29-30,34-35	B
65	Column A, Line 39	A
66	Column A, Lines 3-4	B
66	Column A, Line 10	A
67	Column A, Lines 3,6	A
67	Column A, Lines 11,16-17	B
68	Column A, Lines 3,8,10	A
69	Column A, Lines 4,9,11,17,22,24,27	A

70	Column A, Lines 3,6,9,16,18,23,27,29	A
71	Column A, Lines 2-4,14-17,20	A
72	Column A, Lines 4-7,11,14-16,19,21,23,26	A
73	Column A, Line 2	B
73	Column A, Line 6	A
73	Column A, Lines 9-15,18-22	B
73	Column A, Line 28	A
73	Column A, Lines 31-33	B
75	Column A, Lines 3-6,8-10,13-17,19-20	B
75	Column A, Lines 22-23	A
75	Column A, Lines 26,28-29	B
75	Column A, Line 30	A
75	Column A, Line 42	B
76	Column A, Lines 56,60,65,91-93,96-98	A
77	Column A, Lines 2,4	A
78	Column A, Lines 2,4,10,13,16,19-20	A
79	Column A, Lines 2,4	A
80	Column A, Lines 1,3,6,9	A
80	Column B, Line 13	A
80	Column C, Line 15	A
80	Columns B,C, Line 16	A
80	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
80	Column A, Lines 35,37,39	A
81	Column A, Lines 1,3,6,9	A
81	Column B, Line 13	A
81	Column C, Line 15	A
81	Column B,C, Line 16	A
81	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
81	Column A, Lines 35,37,39	A
82	Column A, Lines 2-5	A
82	Column A, Lines 8-10	B
82	Column A, Lines 13,14	A
82	Column A, Lines 18-22	B
82	Column A, Lines 24-26	A
82	Column A, Lines 29-30,34-35	B
82	Column A, Line 39	A
83	Column A, Lines 3-6	B
83	Column A, Line 7	A
83	Column A, Line 9	B
83	Column A, Lines 10,11,13,20	A
84	Column A, Lines 3,6	A
84	Column A, Lines 11,16-17	B



85	Column A, Lines 3,8,10	A
86	Column A, Lines 4,9,11,17,22,25,27	A
87	Column A, Lines 3,6,9,16,18,23,27,29	A
88	Column A, Lines 4-7,11,14-15,17,19,21,23,26	A
89	Column A, Lines 2-4,14-17,20	A
90	Column A, Line 2	B
90	Column A, Line 6	A
90	Column A, Line 9-15,18-22	B
90	Column A, Line 28	A
90	Column A, Line 31-33	B
92	Column A, Line 3-6,8-10,13-17,19-22	B
92	Column A, Line 24-25	A
92	Column A, Line 28,30-31	B
92	Column A, Line 32	A
92	Column A, Line 44-45	B
93	Column A, Line 56,60,65,91-93,96-98	B
95	Line 1, Cols. B-F	A
96-97	All under Col. B	A
98-99	All under Cols. C-F, H-I, L	A
100-101	All under Cols. C-Q	A
102	Lines 1-22, All under Cols. D-E	B
	Lines 24-33, All under Cols. D-E	A
	Lines 37-52, All under Cols. D-E	B
103	All under Cols. D-E	B
104	All under Cols. D-G	A
105	All under Col. D	A
106	All under Cols. D-F	A
107-120	All under Col. D	B
	Lines 1-10, All under Col. C	B
121-143	All under Col. D	A
145	Lines 1-9, Cols. A,D,F	A
	Lines 12-19 Col. F	A

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3	Ln 3, 4, 10, 17, 19, 20, 21, 22 Col D	A
3	Ln 8, Col D	B
4	Ln 2, 3, 7, 10, 13, 16, 19 Col D	A
5	Ln 26, 27, 29, 36, 40, 42, 44 Col D	A
6	Ln 50, 51, 54, 59, 60, 61	A
13	Ln 12, 13	A
17	Ln 11, 12, 14 1, 4, 6, 9, 16, 21, 24, 26, 29	B A
18	Ln 1	A
20	Ln 1, 4, 6, 9, 11, 14, 39, 43, 45	A
21	Ln 1, 4, 11 Ln 6, 7, 9	A B
22	Ln 1, 4, 16, 18, 19, 22, 24 Ln 6, 7, 9, 11, 12, 14	A B
23	Ln 1, 4, 6, 8, 13, 16, 18, 21, 23, 26, 28, 31, 34	A
24	Ln 1, 4, 6, 9, 11, 14, 16, 19, 21, 24, 26, 29, 31, 34, 36, 39, 41, 44, 46, 47, 48	A
25	Ln 2 Ln 4, 5, 7, 9, 11, 13	B A
26	Ln 1, 4, 6, 9, 12	A
27	Ln 1-7, 10, 16, 19, 20, 21, 23-25, 27, 31	A
28	Ln 9, 10, 11, 12	A
29	Ln 15, 16	A

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30	Ln 3, 6, 13, 17, 20, 22, 25, 27, 29, 33-46	A
30	Ln 8, 9, 11	B
31	Ln 47, 50, 52, 56, 59, 61, 63, 66	A
32	Ln 3, 6, 13, 17, 20, 22, 25, 27, 29, 33-46 Ln 8, 9, 11	A B
33	Ln 47, 50, 52, 56, 59, 61, 63, 66	A

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25	Column A, Lines 2,4	A
26	Column A, Lines 2,4,6,14,15,20,23,24	A
27	Column A, Lines 3-6,8-10,13-17,19-20	B
27	Column A, Lines 22-23	A
27	Column A Lines 26,28-29	B
27	Column A, Line 30	A
27	Column A, Line 42	B
28	Column A, Lines 56,60,65,91-93,96,98	A
29	Column A, Lines 2,4	A
30	Column A, Lines 1,3,6,9	A
30	Column B, Line 13	A
30	Column C, Line 15	A
30	Column B,C, Line 16	A
30	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
30	Column A, Lines 35,37,39	A



31	Column A, Lines 1,3,6,9	A
31	Column B, Line 13	A
31	Column C, Line 15	A
31	Column B,C, Line 16	A
31	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
31	Column A, Lines 35,37,39	A
32	Column A, Lines 2-5	A
32	Column A, Lines 8-10	B
32	Column A, Lines 13,14	A
32	Column A, Lines 18-22	B
32	Column A, Lines 24-26	A
32	Column A, Lines 29-30,34-35	B
32	Column A, Line 39	A
33	Column A, Lines 3-4	B
33	Column A, Line 10	A
34	Column A, Lines 3,6	A
34	Column A, Lines 11,16-17	B
35	Column A, Lines 3,8,10	A
36	Column A, Lines 4,9,11,17,22,24,27	A
37	Column A, Lines 3,6,9,14,16,18,23,25,27,29	A
38	Column A, Lines 2-4,14-17,20	A
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40	Column A, Lines 2,4-5	B
40	Column A, Line 6	A
40	Column A, Line 8	B
40	Column A, Line 10	A
40	Column A, Lines 12-13	B
40	Column A, Lines 14-15,21,27,30,32,34	A
42	Column A, Lines 2,4	A
43	Column A, Lines 2,4,10,13,16,19-20	A
44	Column A, Lines 3-6,8-10,13-17,19-22	B
44	Column A, Lines 24-25	A
44	Column A, Lines 28,30-31	B
44	Column A, Line 32	A
44	Column A, Lines 44-45	B
45	Column A, Lines 56,60,65,91-93,96,98	A
46	Column A, Lines 2,4	A
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51	Column A, Lines 3,6	A
51	Column A, Lines 11,16-17	B
52	Column A, Lines 3,8,10	A
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54	Column A, Lines 3,6,9,14,16,18,23,25,27,29	A
55	Column A, Lines 4-7,11,14-15,17,19,21,23,26	A
56	Column A, Lines 2-4,14-17,20	A
57	Column A, Lines 2,4-5	B
57	Column A, Line 6	A
57	Column A, Line 8	B
57	Column A, Line 10	A
57	Column A, Lines 12-13	B
57	Column A, Lines 14-15,21,27,30,32,34	A
60	Line 1, Cols. C-G	A
61-62	All under Col. B	A
63-64	All under Cols. C-F, H-I, L	A

65-66	All under Cols. C-Q	A
67	Lines 1-22, All under Cols. D-E	B
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68	All under Cols. D-E	B
69	All under Cols. D-G	A
70	All under Cols. D-F	A
71	All under Col. D	A
72-85	All under Col. D	B
	Lines 1-10, All under Col. C	B
86-108	All under Col. D	A
110	Lines 1-9, Cols. A,D,F	A
	Lines 12-19 Col. F	A