



VISTA-UNITED

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July 26, 1990

Mr. Steve Tribble
Director, Division of Records
and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Request for Specified Confidential Classification
Docket No. 900039-TL - Mt. Dora EAS

Dear Mr. Tribble:

Enclosed please find an original and 15 copies of Vista-United Telecommunications' Request for Specified Confidential Classification for Traffic Study in response to Order No. 22567, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

James T. Schumacher
James T. Schumacher
Manager, Business Affairs

JTS/b

Enclosures

cc: All Parties of Record

DN D 3220-90

DOCUMENT NUMBER-DATE

P.O. Box 10180 • Lake Buena Vista, Florida 32830-0180 • 10974 AUG -2 1990

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05-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by the Orange County) DOCKET NO. 900039-TL
Board of County Commissioners for EAS)
between Mount Dora Exchange and the Apopka,)
Orlando, Winter Garden, Winter Park, East)
Orange, Reedy Creek, Windermere, and Lake)
Buena Vista Exchanges)

VISTA-UNITED TELECOMMUNICATIONS'
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW Vista-United Telecommunications ("Vista-United Telecommunications" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Specified Confidential Classification in the above-referenced docket. In support of its Request, Vista-United Telecommunications states as follows:

1. On February 16, 1990, the Commission issued Order No. 22567, in the above-referenced docket, which required Vista-United Telecommunications ("Vista-United Telecommunications" or "Company") to file a traffic study on a route that is interLATA in nature. In response to the Commission's Order, Vista-United Telecommunications has filed the traffic study and is requesting that they be classified as proprietary confidential business information. In accord with Rule 25-22.006(4) (d), Florida Administrative Code, the information for which confidential classification is sought is intended to be and is treated by Vista-United Telecommunications as private and has not been disclosed.

2. The traffic study relative to the interLATA routes at issue in this proceeding basically provides a blueprint of the toll usage over this route. The information contained in the traffic study was obtained from AT&T Communications of the Southern States, Inc. ("AT&T") with the express understanding that such information was proprietary confidential business information and as such should be protected from public disclosure in these proceedings. The same information is normally made available to Vista-United Telecommunications by AT&T on a confidential basis in order that Vista-United Telecommunications may accurately plan its network deployment based on actual and perceived traffic demand over the relevant toll routes.

3. 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 indicate the quantity of toll traffic over the East Orange to Mt. Dora route and the Orlando to Mt. Dora route. The disclosure of such traffic patterns to the

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06974 AUG -2 1990

REC-RECORDS/REPORTING

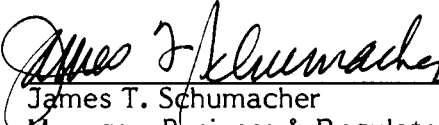
public would make available to AT&T's competitors highly valuable competitive information which such competitors could use to determine whether or not to target this particular route.

4. If the Commission were to publicly release the interLATA traffic data Vista-United Telecommunications has obtained from AT&T, not only would such public release competitively harm AT&T directly, but it also would almost certainly harm Vista-United Telecommunications because AT&T might hereafter withhold such information from Vista-United Telecommunications due to the threat of public release of such information. Without accurate traffic data from the interexchange carriers, Vista-United Telecommunications would be severely hampered in its efforts to plan its needed network deployment, particularly with regard to situations where expansion may be needed. See, Order No. 22139, in Docket No. 881547-TL, and Order No. 22228, in Docket No. 890362-TL, in which the Commission held that similar traffic studies reflecting interLATA AT&T traffic were confidential.

5. For all the foregoing reasons, Vista-United Telecommunications respectfully urges the Commission to classify the above-described and discussed interLATA traffic data as specified confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Section 119.07, Florida Statutes. Due to the uncertainties involved in the viability of the particular toll routes at issue in the area covered by this request, no specific date can be determined when such information would become non-proprietary. Consequently, Vista-United Telecommunications would urge that the Commission recognize that the information will remain proprietary confidential business information for as long as permitted by Rule 25-22.006, Florida Administrative Code.

WHEREFORE, Vista-United Telecommunications moves the Prehearing Officer to enter his Order declaring this information to fall within the specified confidential classification.

Respectfully submitted,



James T. Schumacher
Manager, Business & Regulatory Affairs
Vista-United Telecommunications
3100 Bonnet Creek Road
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CERTIFICATE OF SERVICE

DOCKET NO. 900039-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States
Mail this 30th day of July, 1990 to:

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