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FILE COPY

**Southern Bell**

c/o Marshall M. Criser  
Suite 400  
150 So. Monroe Street  
Tallahassee, FL 32301  
Phone: (305) 530-5558

E. Barlow Keener  
Attorney

April 22, 1991

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

Re: Docket No. 870790-TL - Gilchrist County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Direct Testimony of Ann M. Barkley, Sandra M. Fox, and Sandy E. Sanders. Also enclosed is Southern Bell Telephone and Telegraph Company's Request for Specified Confidential Classification, 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 yours,

*E. Barlow Keener*  
E. Barlow Keener

cc: All Parties of Record  
A. M. Lombardo  
Harris R. Anthony  
R. Douglas Lackey

- Testimony*
- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_ Enclosures
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN *Lexis* \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- GTH \_\_\_\_\_

RECEIVED & FILED

*J.D.*

*Barkley* DOCUMENT NUMBER-DATE 03880 APR 22 1991  
*Request* ✓✓ DOCUMENT NUMBER-DATE 03879 APR 22 1991  
 BELL SOUTH Company  
 FSC-RECORDS/REPORTING

*Sanders* DOCUMENT NUMBER-DATE 03892 APR 22 1991  
 FSC-RECORDS/REPORTING  
*Fox* DOCUMENT NUMBER-DATE 03891 APR 22 1991  
 FSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 870790-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this *22<sup>nd</sup>* day of *April*, 1991,  
to:

Debra Schiro  
Division of Legal Services  
Florida Public Svc. Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Richard H. Brashear  
ALLTEL Florida, Inc.  
Post Office Box 550  
Live Oak, Florida 32060

Gilchrist County  
Board of County Commissioners  
Post Office Box 37  
Trenton, Florida 32693

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, Florida 32301

Florida Interexchange Carriers  
Association  
c/o Joseph Gillan  
Post Office Box 547276  
Orlando, Florida 32854

Theodore M. Burt  
114 Northeast First Street  
Post Office Box 308  
Trenton, Florida 32693

*E. Barlow Keener*

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for Extended ) Docket No. 870790-TL  
Area Service (EAS) Through )  
Gilchrist County. ) Filed: April 22, 1991  
\_\_\_\_\_)

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Specified Confidential Classification for certain information included in Exhibits attached to Southern Bell's Direct Testimony of Sandy E. Sanders and Sandra M. Fox in the above-referenced docket.

1. On April 22, 1991, Southern Bell filed with the Florida Public Service Commission ("Commission") Southern Bell's Direct Testimony of Sandy Sanders and Sandy Fox. The Exhibits attached to the Direct Testimony that Southern Bell is submitting contain interLATA interexchange carrier ("IXC") traffic information which is proprietary confidential business information. See, Order No. 20051 and Order No. 22983. The information that Southern Bell considers proprietary has been highlighted for identification purposes and appended hereto as Attachment "A". The information contains AT&T Communications of the Southern States, Inc.'s ("AT&T") interLATA traffic data regarding toll routes in Gilchrist County received from AT&T pursuant to a nondisclosure agreement. In accord with Rule 25-22.006, Florida Administrative Code, Southern Bell has appended hereto as Attachment "B" two

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edited copies of the Exhibits attached to the Direct Testimony with this confidential information removed.

2. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on Southern Bell or its ratepayers will result from the disclosure of the information to the public. Southern Bell is requesting that the Commission treat only interLATA IXC traffic information described above as confidential. Southern Bell is identifying this confidential information on a line-by-line basis and is appending such line-by-line identification hereto as Attachment "C".

3. The traffic data relative to the interLATA routes at issue in this proceeding basically provide a blueprint of the toll usage over these various routes. The information contained in these traffic studies was obtained from 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 Southern Bell by AT&T on a confidential basis in order that Southern Bell may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

4. 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 indicates which routes at issue in this case contain the most concentrated traffic. The disclosure of such traffic patterns to the public would make available to AT&T's competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. If the Commission were to publicly release the interLATA traffic data Southern Bell has obtained from AT&T, not only would such public release competitively harm AT&T directly, but it also would almost certainly harm Southern Bell because AT&T could hereafter withhold such information from Southern Bell due to the threat of public release of such information. Of course, without accurate traffic data from the interexchange carriers, Southern Bell would be severely hampered in its efforts to plan its network deployment, particularly with regard to situations where expansion may be needed.

5. The information for which confidential treatment is requested has not been disclosed except pursuant to a protective agreement that provides that the information will not be released to the public.


6. For all the foregoing reasons, Southern Bell respectfully urges the Commission to classify the above-described and discussed interLATA traffic data as proprietary confidential business information pursuant to Rule 25-22.006, Florida

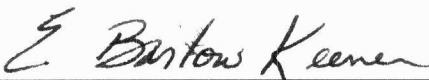
Administrative Code, and as such exempt from Section 119.07,  
Florida Statutes.

WHEREFORE, Southern Bell Telephone and Telegraph Company  
moved the Commission to enter his Order declaring this  
information to fall within the specified confidential  
classification.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

  
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ATTACHMENT C

	<u>LINE NO.</u>	<u>REASON</u>
<u>Fox Exhibit</u>		
Page 7	1-3	AT&T Propriety
<u>Sanders Exhibit</u>		
Exhibit 1, Page 2	1-3	AT&T Propriety
Exhibit 2, Page 1	1-3	AT&T Propriety
Exhibit 3, Page 1	1-3	AT&T Propriety
Exhibit 3, Page 2	1-3	AT&T Propriety
Exhibit 4, Pages 9-11	1-28	AT&T Propriety