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June 6, 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. 910022-TL - Bradford County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Traffic Study in response to Order No. 24208 and 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

Enclosures

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

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE
Docket No. 910022-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this ^{6th} day of *June*, 1991
to:

Charles Murphy
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

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

E. Barlow Keener

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by Bradford County) Docket No. 910022-TL
Commission requesting extended area)
service within Bradford County, Union) Filed: June 6, 1991
County, and Gainesville.)
_____)

**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 Southern Bell's Traffic Studies filed in the above-referenced docket.

1. On March 8, 1991, the Florida Public Service Commission ("Commission") issued Order No. 24208 which required Southern Bell to file traffic studies. In response to the Commission's Order, Southern Bell is filing the traffic studies on routes that 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 Bradford County and Union County received from AT&T pursuant to a nondisclosure agreement. In accord with Rule 25-22.006, Florida Administrative Code, Southern

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Bell has appended hereto as Attachment "B" two edited copies of the traffic studies 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,

ATTORNEYS FOR SOUTHERN BELL
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SOUTHERN BELL TELEPHONE & TELEGRAPH CO.
BRADFORD COUNTY TRAFFIC STUDIES
DOCKET NO. 910022-TL

	<u>Line No.</u>	<u>Reason</u>
<u>Attachment A</u>		
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<u>Attachment A-1</u>		
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<u>Attachment B</u>		
Pages 5-11	1-28	AT&T Proprietary
<u>Attachment D</u>		
Page 1	1-7	AT&T Proprietary
Pages 18-45	1-25	AT&T Proprietary
<u>Attachment E</u>		
Pages 1-2	1-7	AT&T Proprietary
<u>Attachment F</u>		
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