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July 25, 1991

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

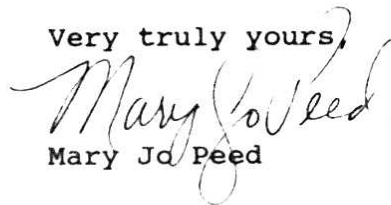
Re: Docket No. 910060-TP

Dear Mr. Tribble:

Enclosed please find Southern Bell Telephone and Telegraph Company's Request for Confidential Treatment of Certain Documents Produced in Response to Citizens's First Set of Request for Production of Documents, to be filed for the Commission's consideration, in the above styled docket. Service is being provided in accordance with the attached Certificate of Service.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Thank you for your assistance in this matter.

Very truly yours,

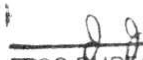


Mary Jo Peed

Enclosures

cc: H. R. Anthony  
A. M. Lombardo  
R. Douglas Lackey  
All Parties noted on Certificate of Service

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

A BELL SOUTH Company

DOCUMENT NUMBER DATE  
07546 JUL 25 1991  
RECORDS/REPORTING

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition of the Attorney )  
General and the Public Counsel ) Docket No. 910060-TP  
to Adopt Rules Governing 900 )  
\_\_\_\_\_ ) Date Filed: July 25, 1991

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL TREATMENT OF CERTAIN  
DOCUMENTS PRODUCED IN RESPONSE TO CITIZENS  
FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS

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 Confidential Treatment of Those Documents Referenced in Paragraphs 6, 7, 8, 9 and 10 of Southern Bell's (1) Response and Objections to the Citizens First Set of Request for Production of Documents and (2) Motion for a Temporary Protective Order.

1. On May 9, 1991, the office of Public Counsel ("Public Counsel") served its First Set of Request for Production Documents on Southern Bell. Southern Bell responded to Public Counsel's filing on June 13, 1991, by producing for Public Counsel numerous documents for his review. Southern Bell also filed with this Commission its (1) Response and Objections to Citizens First Set of Request for Production of Documents and (2) Motion for a Temporary Protective Order. The motion for protective order sought temporary confidential treatment for a number of documents produced in response to Requests Nos. 1, 5, 6, 7 and 8, which contained information exempted from Section 119.07(1), Florida Statutes, (the "Florida Public Records Act")

DOCUMENT NUMBER-DATE

07546 JUL 25 1991

FSC-RECORDS/REPORTING

or which contained proprietary confidential business information as defined in Section 364.183, Florida Statutes, which is also exempted from the Florida Public Records Act. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, Southern Bell allowed Public Counsel to inspect and take possession of these confidential documents for the purpose of allowing Public Counsel to determine what information contained in them it may want to use at a hearing in this proceeding.

2. On June 19, 1991, Southern Bell received correspondence from Charles J. Beck, Assistant Public Counsel, requesting that Southern Bell file a detailed specific request for a protective order for each of confidential documents produced in response to Citizens First Set of Request for Production of Documents. A copy of said letter is appended hereto as Attachment "A".

3. Pursuant to Rule 25-22.006, Florida Administrative Code, Southern Bell is providing one copy of its confidential documents highlighted. The highlighted documents are appended hereto in a number of sealed envelopes as Attachments "B", "C", "D", "E", "F" and "G". The edited copies of these documents with the confidential information removed are appended hereto as Attachments "H" and "I". The material for which confidential classification is sought is intended to be and is treated by Southern Bell as private and has not been disclosed.

PUBLIC COUNSEL'S REQUEST NO. 1

4. Southern Bell requests confidential treatment of p. 911, lines 2 and 38; p. 912, lines 3, 38 and 39; p. 913, lines

2 and 3; and p. 914, lines 9, 44-47 and 54; p. 915, lines 5, 31 and 36-39; p. 916, line 3; p. 917, line 3; and p. 918, line 3. Said pages and lines contain information which is exempted from the Florida Public Records Act by Section 119.07(3)(w), Florida Statutes, which states that "All records supplied by a telecommunications company to a state or local governmental agency which contain the name, address, and telephone number of subscribers are exempted from the provisions of Subsection (1)."

5. Southern Bell requests confidential treatment of p. 921, lines 10, 15, 18 and 26; p. 922, lines 11, 13 and 20-21; pp. 923-926, all lines, with the exception of the column headings. Pp. 923-926, all lines, contain a listing of Southern Bell's 976 information providers by 976 telephone number, program name, price, subscriber or contact name and contact number. Pp. 921 and 922, contain information concerning specific 976 subscribers of Southern Bell by telephone number or name of subscriber. Therefore, the above mentioned documents by page and line number are exempted from disclosure under the Public Records Act Section 119.076(3)(w), Florida Statutes.

6. Southern Bell requests confidential treatment of the worksheets and summary found at p. 825, lines 4, 27-29; p. 826, lines 4-5, 27-29; p. 828, lines 13-14, 16-20; p. 829, lines 4-8, 11-33; p. 810, lines 16, 23, 26; p. 834, lines 16-18; p. 835, lines 8-19; p. 843, lines 4, 6, 12; p. 844, lines 2, 3, 5, 9; p. 850, lines 5-6, 9, 27-29. The study performed by BellSouth Services calculated the economic impact upon Southern Bell of the

proposed change to Rule 25-4.110, Florida Administrative Code. The information for which Southern Bell requests confidential treatment reflects a portion of the costs to Southern Bell of providing billing and collection services, and therefore, represent proprietary confidential business information as that term is defined in Section 364.183(3)(e), Florida Statutes. The disclosure of these documents would impair the competitive position of Southern Bell for billing and collection services.

PUBLIC COUNSEL'S REQUEST NO. 5

7. Southern Bell requests confidential treatment of all documents produced in response to Request No. 5 as delineated by page and line number shown on Attachment "J". All documents produced in response to Request No. 5 are records of complaints which Southern Bell has received about 900 and 976 service and contain customer name, address, and telephone number. Such information is exempted from disclosure under the Public Records Act, Section 113.07(3)(w), Florida Statutes.

PUBLIC COUNSEL'S REQUEST NO. 6

8. With regard to Request No. 6, Southern Bell requests confidential treatment of certain pages and lines of three documents, they are: (1) Southern Bell and South Central Bell billing and collection carrier guidebook/handbook procedures dealing with customer complaints concerning a specific interexchange carrier's 900 services. These documents contain specific procedures by 900 service carrier for the handling of customer complaints and therefore contain customer specific

information and are exempted from disclosure under Florida Public Records Act, Section 119.07(3)(w), Florida Statutes. Further, the billing and collections agreement executed between Southern Bell and the interexchange carriers providing 900 services require such information to be held as confidential by Southern Bell. Such disclosure would harm the competitive position of the interexchange carriers in providing competitive 900 services and the information should be determined to be proprietary confidential business information as defined by Section 364.183(3)(e), Florida Statutes. The confidential information appears on the following pages: p. 871, lines 1, 15, 42; p. 872, lines 1, 6, 34, 36-37, 39, 42-43; p. 873, lines 1, 8, 10, 12, 14-15, 20, 42-43; p. 874, lines 1, 8, 42, 44-45; p. 875, lines 1, 7, 17, 19, 26, 33, 37, 47, 49; p. 876, lines 1, 10-11, 31; p. 877, lines 1, 10, 13, 29, 44; p. 878 lines, 1, 16, 27; p. 879, lines 1, 11-16, 22, 28, 31 44-46; p. 880, lines 1, 16, 26, 43; p. 881, lines 1, 7, 35, 37, 42; p. 882, lines 1, 8, 10, 12, 14, 18, 40-41; p. 883, lines 1, 10, 43, 45, 55; p. 884, lines 1, 9, 11, 20, 35; p. 885, lines 1, 9, 11, 30, 38, 43; p. 886, lines 1, 9, 16, 27, 39, 43; p. 887, lines 1, 11, 17, 28, 49; p. 888, lines 1, 10-14, 23, 26, 30, 32, 39-47; p. 888A, lines 1, 8, 13, 23; p. 888B, lines 1, 4, 21-23, 27; p. 888C, lines 1, 5-6, 8, 11, 13, 24; p. 888D, lines 1, 6, 8-9, 36-37, 46; p. 888E, lines 1, 5, 13, 15, 18, 22, 24, 35, 38; p. 888F, lines 1, 7-8, 24, 29, 32-33; p. 888G, lines 1, 6, 10, 20, 32, 35; p. 888H, lines 1, 9, 15, 24, 39; p. 888I, lines 1, 6-10, 12, 14, 18-19, 29-34.

PUBLIC COUNSEL'S REQUEST NO. 7

9. With regard to Request No. 7, Southern Bell requests confidential treatment of certain pages and lines of two documents, they are: (1) A settlement report for Southern Bell's 976 information providers which list the subscriber of Southern Bell by name, the number of calls, the transport charges per subscriber, the number of adjustments per subscriber, dollar amount of the adjustments per subscriber, settlement amount per subscriber, and percentage of total messages adjusted per subscriber. The confidential information is found at the following page numbers and line numbers: p. 903, lines 6-58; p. 904, lines 6-50; p. 905, lines 6-50; p. 906, lines 6-56; p. 907, lines 1-3; p. 908, lines 6-56; p. 909, lines 6-57. This report contains customer specific information exempted from disclosure under the Florida Public Records Act, Section 119.07(3)(w), Florida Statutes, and also contains information which if disclosed would impair the competitive 976 and associated billing and collection services of Southern Bell. Such information is defined as proprietary confidential business information under Section 364.183(3)(e), Florida Statutes.

10. (2) A document entitled "Highlights of the 900 Adjustment Study, Southern Bell - August, 1990." Pages 851 and 852 contain data which is a summary of the data shown on pages 853-858 of this document. The data is, however customer specific as to number of 900 messages processed, number of 900 messages adjusted and amount of 900 revenue adjusted. Such information

should be considered proprietary confidential business information as defined by Section 364.183(3)(e), Florida Statutes. The disclosure of this information would impair Southern Bell's customers ability to provide competitive 900 services. Further, such information is not to be disclosed by the billing and collection agreements executed between Southern Bell and its interexchange carrier customers. Pages 853 through 858 of this document list by name Southern Bell's billing and collection interexchange carrier customers providing 900 service, the 900 telephone number, program name, number of calls, and the dollar amount of adjustments made. The information which Southern Bell seeks to be treated as confidential is described by page and line number as follows: p. 853, lines 6-70, 73-76; p. 854, lines 1, 6-26; p. 855, lines 1, 7-13; p. 856, lines 1, 8-47; p. 857, lines 6-8; p. 858, lines 7-75. These pages and lines contain customer specific information exempted from disclosure under the Florida Public Records Act, Section 119.07(3)(w), Florida Statutes, and also contains information which if disclosed would impair the competitive position of Southern Bell's customers who compete in the area of 900 services. Such information is defined as proprietary confidential business information under Section 364.183(3)(e), Florida Statutes. Further, the billing and collection services agreements executed between Southern Bell and its interexchange carrier customers and require information to be held confidential.



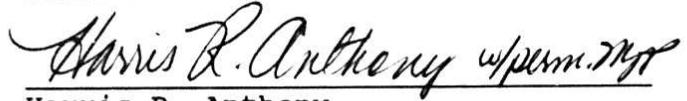
PUBLIC COUNSEL'S REQUEST NO. 8

11. With regard to Request No. 8, Southern Bell requests confidential treatment of all pages and lines of two documents, they are: (1) a document found at pages 897-901, all lines, entitled "Income Statement Summary Report." This document prepared by BellSouth Services concerns the profitability of 976 service in Florida based upon certain assumptions. If disclosed, the information would impair the competitive position of Southern Bell in the provision of competitive pay-per-call services. Such information is defined as proprietary confidential business information under Section 364.183(3)(e), Florida Statutes. (2) A document entitled "Product Proposal - BellSouth IntraLATA 900 Service - August 2, 1990." This document is found at pages 889-896 and Southern Bell requests confidential treatment of all lines. The document contains an analysis of the benefits and costs to Southern Bell of introducing a 900 intraLATA service which if disclosed would impair Southern Bell's ability to effectively compete in the pay per call market. Such information is defined as proprietary confidential business information under Section 364.183(3)(e), Florida Statutes.

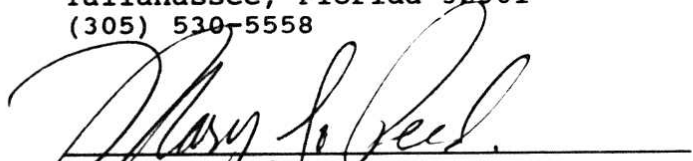
WHEREFORE, Southern Bell requests that the Commission grant its request for confidential treatment.

Respectfully submitted,

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CERTIFICATE OF SERVICE  
Docket No. 910060-TP

I HEREBY CERTIFY that a copy foregoing has been furnished by  
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