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July 9, 1992

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

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for a Permanent Protective Order which we ask that you file in the above-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 on the parties shown on the attached Certificate of Service.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTE \_\_\_\_\_
- DAG \_\_\_\_\_
- LFC \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely yours,

*Nancy B White*  
Nancy B. White

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
H. R. Anthony  
R. D. Lackey

RECEIVED & FILED  
FPSC-BUREAU OF RECORDS  
INVESTMENT NUMBER-DATE

7491-92 forwarded  
to COME

07490 JUL -9 1992

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 920260-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 9th day of July, 1992 to:

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Nancy B. White *NY*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of ) Docket No. 920260-TL  
the Revenue Requirements and Rate )  
Stabilization Plan of Southern ) Filed: July 9, 1992  
Bell Telephone and Telegraph )  
Company (Formerly FPSC Docket )  
Number 880069-TL) )  
\_\_\_\_\_ )

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR A PERMANENT PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, and Rules 1.280(c), Florida Rules of Civil Procedure, and files its Request for Confidential Classification and Motion for a Permanent Protective Order regarding certain portions of Southern Bell's response to Staff's First Request for Production of Documents, dated April 17, 1992, which response was filed in this Docket on behalf of Southern Bell on May 22, 1992. In support of its Request and Motion, Southern Bell shows the following:

1. On April 17, 1992, the Staff of the Florida Public Service Commission ("Staff") served the Staff's First Request for Production of Documents on Southern Bell. Item No. 16 requested a copy of the General Ledger for 1991.

2. On June 18, 1992, Southern Bell filed its Notice of Intent to Request Specified Confidential Classification for the information contained in the General Ledger. With its filing of the Notice, the Staff took possession of the information.

DOCUMENT NUMBER-DATE  
07490 JUL -9 1992  
FPSC-RECORDS/REPORTS

3. In accordance with Rule 25-22.006, Florida Administrative Code, Southern Bell is now filing its Request for Confidential Classification and Motion for Permanent Protective Order for the information contained in the General Ledger delivered to Staff. Southern Bell has appended to this request for confidential classification as Attachment "A" a listing of the location in the General Ledger of the information designated by Southern Bell as confidential.

4. Appended hereto in an envelope designated as Attachment "B" are two copies of the General Ledger with the confidential information deleted. As stated above, Southern Bell previously provided Staff with the General Ledger containing the confidential information. Appended hereto in an envelope designated as Attachment "C" is a copy of the General Ledger with the proprietary information highlighted.

5. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains details of revenues and expenses from nonregulated services and activities as well as investments in nonregulated services and activities. Any competitor or potential competitor for these services and activities would benefit from possession of this information. Possession of this information would assist Southern Bell's competitors in identifying which particular services are profitable and where to focus facility expansion and marketing efforts. If this information were allowed to be released in the public domain, Southern Bell's revenues could well be diminished,

with a resulting shortfall which would work to the obvious detriment of Southern Bell's ratepayers as well as harm the competitive position of Southern Bell in the provision of unregulated services.

6. This information has been developed internally by Southern Bell at considerable time and expense and is not readily ascertainable by Southern Bell's competitors who could obtain economic value from its disclosure. Southern Bell considers this information highly confidential and valuable business information which is not disclosed outside of Southern Bell and its affiliates. Consequently, this information constitutes trade secrets which are expressly deemed to be proprietary confidential business information pursuant to § 364.183, Florida Statutes, and which are exempt from the Open Records Act. The disclosure of this information publicly could lead to the dilution or elimination of its value, both internally as well as externally.

7. In accordance with Rule 25-22.006, Florida Administrative Code, this information for which confidential treatment is sought is intended to be and is treated by the Company as private and has not been disclosed on a nonconfidential basis.

WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached exhibits, to be confidential proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 9th day of July, 1992.

ATTORNEYS FOR SOUTHERN BELL  
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ATTACHMENT A

STATEMENT AND INDEX OF PROPRIETARY MATERIAL

Attached hereto is an index of the proprietary material contained in the General Ledger made the subject of this Request for Confidential Classification and Motion for a Temporary Protective Order. The proprietary information consists of data concerning the revenues, expenses, and investments of Southern Bell's nonregulated services and activities. This information has been developed by Southern Bell at considerable time and expense and is not readily ascertainable by Southern Bell's competitors in these nonregulated activities. These competitors could obtain economic value from the disclosure of the information. Southern Bell considers this information highly confidential and valuable business information which is not disclosed outside of Southern Bell and its affiliates. Consequently, this information constitutes trade secrets which are expressly deemed to be proprietary confidential business information pursuant to § 364.183, Florida Statutes, and which are exempt from the Open Records Act. The disclosure of this information publicly could lead to the dilution or elimination of its value, both internally as well as externally.

FPSC DOCKET 920260-TL

FPSC STAFF'S 1st REQUEST FOR DOCUMENTS

ITEM NO. 16

The following information identified by page and line numbers is considered confidential and proprietary:

<u>Item</u>	<u>Account</u>	<u>SRC/FRC</u>	<u>Description</u>	<u>Page No.</u>
1	1180.3000	(.3100 - .3220	Telecommunications Accounts Receivable - CPE Billing System	13-14
4	1181.7000	(.7100 - & 7200	CPE Billing Realized Uncollectible Con- vention Center Billing	43
6	1220.2000	(.2100 - .2790	Inventories - Property Held for Sale or Lease- Unregulated	70-73
7	1402	(.1000 - .5000	Investments In Non- affiliated Companies	78-79
8	2114	(240 NC only)	Special Purpose Vehicles Convention Center	N/A
10	2341		Large PBXs	127
11	2362	968NC	Inmate Services - Unregulated	132 & 139
14	3100	258NX	Large PBX - Centrex Attendant Position Equip.	326
		358NX	Other Terminal Equip. Digital NCTE	330
17	4010	6940	CPE Sales/Use Taxes	378
18	4030	2200	Convention Center	390-391
18A	4120	7000	Accrued Recourse Sales	405
19	4360	4000	CPE Maintenance Contracts - CRIS	425



<u>Item</u>	<u>Account</u>	<u>SRC/FRC</u>	<u>Description</u>	<u>Page No.</u>
23	5280 (ALL)		Nonregulated Operating Revenues	531-563
25	6311	2900	Other Expenses	610-613
26	6341	58NM	Convention Center	615-619
27	6362	358NM	Digital NCTE	625
		4000	Inside Wire Expense	627
		4100	Basic	628-631
		4200	Non-Basic (SSO/TRIS)	632-636
		5000	Customer Owned Other Terminal Equip.	637-644
		9000	Other Non-CPI Equip. Expense	648
28	6533		Testing Expense	682-685
	7300			733-735