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August 26, 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. 910163-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification 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 to the parties shown on the attached Certificate of Service.

Sincerely,


Sidney J. White, Jr.

Enclosures

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

X-see 8 DN 08626-92

RECORDED & FILED


DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

09692 AUG 26 1992

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 910163-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 26th day of August, 1992 to:

Charles J. Beck
Assistant Public Counsel
Office of the Public Counsel
Room 812
111 W. Madison Street
Tallahassee, FL 32399-1400

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

A handwritten signature in black ink, appearing to read "Tracy Hatch", written over a horizontal line. The signature is cursive and includes a flourish at the end.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on Behalf of)
Citizens of the State of Florida) Docket No. 910163-TL
to Initiate Investigation into)
Integrity of Southern Bell) Filed: August 26, 1992
Telephone & Telegraph Company's)
Repair Service Activities and)
Reports.)
_____)

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

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 Division Code, and files its Request for Confidential Classification for certain documents or portions of documents referenced in the Company's August 5, 1992 Notice of Intent to Request Specified Confidential Classification ("Notice").

1. In accordance with Rule 25-22.006, Florida Administrative Code, Southern Bell is now filing its Request for Confidential Classification for documents or portions of documents containing information on Company-specific internal audit activity, customers' names, addresses, and other personally identifiable information, and Company-specific security measures, systems, or procedures.

2. Southern Bell has appended to this request for confidential classification as Attachment A, a listing of the location in the documents of the information designated by Southern Bell as confidential. In any instances in which Southern Bell has requested that an entire document be granted

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FPSC-RECORDS/REPORTING

confidential classification, this representation will be included in place of specific location information.

3. Appended hereto in an envelope designated as Attachment B are two edited copies of the documents with the confidential information deleted.

4. A sealed package marked as Attachment C contains copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties to this proceeding.

5. With respect to Southern Bell's original responses to Staff's Request Nos. 7-11, the Company reasserts the objection to the production of these documents on the basis of the attorney-client and work product privileges.

6. With respect to Request No. 16, the document entitled "Methods & Procedures for Managing Access Networking System End Users" dated February 1991, (Notice, at p. 5), confidential classification is requested because this document is basically a "How To" manual for training a select group of Company system administrators in the manner and procedures for properly accessing, using, and securing the Company's installation and maintenance computer systems. This manual receives very limited distribution within Southern Bell. Section 364.183(3)(c), Florida Statutes, expressly includes "Security measures, systems, or procedures" as proprietary confidential business information exempt from § 119.07(1), Florida Statutes (emphasis added). As such, this document is entitled to confidential classification

under Rule 25-22.006, Florida Administrative Code. A sophisticated and knowledgeable computer hacker could use almost any portion of the document to gain valuable information regarding the specific location and contents of crucial security and operational measures relating to this system. If such security systems were to be compromised, Southern Bell would be vulnerable to the many abuses publicly known to be perpetrated by computer hackers, including but not limited to the insertion of computer viruses. Also, access to the systems would allow an unauthorized user to access customer-specific information, connect or disconnect services, or to take users on or off the system. The result of such abuses would obviously harm not only Southern Bell in its direct operations, but also the Company's customers who rely on the Company's systems to operate as intended to serve the public.

7. With respect to Request No. 26, the document referred to in Southern Bell's August 5, 1992 Notice as "...IMSSS, IMS Security System -- Manager Procedures (March 1991) (Notice, at p. 7), confidential classification is requested because this document contains detailed information regarding access to and the security of the IMS-based computer applications within the Company. Such information includes password procedures, methods for ensuring against unauthorized access, methods of access, and other security-related matters. This procedural manual also describes the security measures, systems, and procedures for using such systems. Sophisticated and knowledgeable computer

hackers could utilize literally any and all portions of this document to gain unauthorized entry into these secured systems. The damages from such unauthorized breach of the security of this system could range from annoying "tampering" to systems-destroying viruses. Also, access to these Company systems would allow an unauthorized user to access customer-specific information, connect or disconnect services, or add or eliminate other users from the systems.

8. With respect to Request No. 28, the documents entitled "...Adjustments to Customer Bills (FA010-106-01-A-SF) (October 1989) and the five (5) management letters in response to this report...", confidential classification is requested because these documents consist of a Company-specific internal audit and management letters responding directly to the audit findings contained in the report. Section 364.183(3)(b) expressly includes "Internal auditing controls and reports of internal auditors" as proprietary confidential business information exempt from § 119.07(1), Florida Statutes. Clearly, the above-referenced documents satisfy the statutory standard for protection. Internal audit reports have consistently been afforded confidential classification by this Commission, and the management letters discussing and responding to the audit report are a part and parcel of the audit process and constitute audit control mechanisms to ensure that the issues raised in the report are understood and adequately addressed. Consequently, these

documents are entitled to confidential classification in their entirety.

9. With respect to Request No. 29, the documents referred to as "...the documentation of the 'mini-reviews' conducted by the Network staff organization in Florida..." (Notice, at p. 8), confidential classification is requested because these documents contain specific customers' names, addresses, and other personally identifiable information relating to such customers. The Commission has consistently protected customer-specific information in order to protect the customers' privacy.

10. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

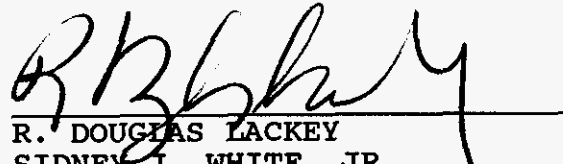
WHEREFORE, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attached exhibits, to be confidential, proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 26th day of August, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY



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ATTACHMENT A
FPSC DOCKET 910163-TL

A. JUSTIFICATION FOR CONFIDENTIAL REQUEST
STAFF'S 17TH REQUEST FOR DOCUMENTS

- 1.a. Item 16 "Methods and Procedures for Managing Access Networking System End Users"
February 1991
- b. Item 26 "IMSSS" "IMS Security System Manager Procedures" January 20, 1992

These two manuals contain highly sensitive proprietary/confidential information used to prevent unauthorized entry into the Company's installation and maintenance computer systems. These manuals receive very limited distribution within the Company. Public disclosure of this information could bring great harm to the Company and its customers. The company's installation and maintenance system for 9 states is administered through LMOS and the associated front and computers. Access is controlled by use of these manuals. Access to these systems would allow an unauthorized user to: access customer specific information, connect or disconnect services, take users off or on the system. Therefore, the company considers these Computer Security System Manuals to be highly proprietary.

2. Item 29 "Mini Reviews" - These reviews contained DLETH (Display Trouble History) forms which contain customer names, addresses, and certain other customer specific information. The FPSC has always zealously protected the customer's right to privacy. The telephone number has not been redacted and gives the Staff the necessary information to evaluate the "mini-reviews".
3. Item 28 - Southern Bell Internal Audit (FA010-106-01-A-SF) October 1989 and the responses to this report. Section 364.183(3) (b) expressly includes "Internal auditing controls and reports of internal auditors" as proprietary confidential business information exempt from section 119.07(1), Florida Statutes.

B. LOCATION OF PROPRIETARY INFORMATION

1. M&Ps for Managing Access Networking System End Users
February 1991. 39 pages

All lines on pages 3-30, 34 are highlighted and considered proprietary. The proprietary information is located on the other pages is as follows:

Page	Lines
1 Index	0
2	13-17
31	24-29, 31-39
32	7-9, 16-18, 22-33, 35-42
33	0
36	3-9
37	3-5, 8, 9, 15, 16, 22-27
38	9, 10
39	4-8, 16-18

2. "IMSSS" "IMS Security System Manager Procedures"
January 20, 1992 69 pages

All lines on pages 3-41, 47-68 are highlighted and considered proprietary. The proprietary information is located on the other pages as follows:

Page	Line
i	0
1	0
2	7-13, 18, 19, 21-23, 28, 29, 33, 34, 36-47
42	0
43	8, 10, 25-32
44	0
45	1, 2, 7-9, 12-20
46	0

3. DLETH - Port of "Mini-Reviews".

The DLETH contains customer specific information such as name, address, and home access information. This specific information is considered proprietary and private information by the Florida Public Service Commission. It is highlighted and has line numbers in the left margin of the sheet where the material appears.

B. LOCATION OF PROPRIETARY INFORMATION

3. (Continued)

This proprietary information appears on the following pages:

Group	Pages	Total Pages
GP 1	6-22, 24-46, 48-56, 58-61	61
GP 2	7-20, 22-30, 32-56, 58-62	62
GP 3	9, 11-26, 28-60	60
GP 4	6-55	55
GP 5	6-18, 19-26	59
GP 6	4, 5, 7, 8, 11-15, 17-23, 25-38, 40-43	43
GP 7	2-5, 7, 8, 10-18, 21-26, 28-33, 35-40, 42-60	61
✓ GP 8	1-12, 14-42, 44-48, 50-54, 56	59
✓ GP 9	13-36, 38-48, 50-70	70
✓ GP 10	7-62	62
✓ GP 11	6-15, 17-59	59
✓ GP 12	5-21, 23-34, 36-66	66
✓ GP 13	26-32, 34-49, 51-70, 72-82, 84, 85	85

4. Internal Audit FA010-106-01-A-SF "Adjustments to Customer Bills" conducted in October 1989 is proprietary in its entirety. A copy is enclosed as a part of Attachment C.