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October 30, 1992

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

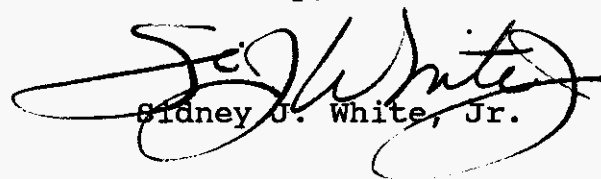
RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned docket.

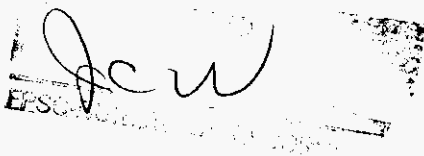
A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,


Sidney J. White, Jr. :

Enclosures

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



DOCUMENT NUMBER 920260-TL

12787 087 50 101

EPSC-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 30th day of October, 1992 to:

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FPC-RECORDS/REPORTING

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A handwritten signature in cursive script, appearing to read "J. J. White". The signature is written in black ink on a white background. The letters are fluid and connected, with a prominent loop at the end of the last name.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: October 30, 1992
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

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 portions of certain Company responses to Staff's Seventh Set of Interrogatories dated September 25, 1992.

1. Southern Bell is filing its Request for Confidential Classification for portions of Interrogatory Response Nos. 258, 264 and 273, which contain certain information concerning proprietary Percent Interstate Use (PIU) Audits conducted by Southern Bell on various interexchange carriers (IXCs) and financial information on unregulated company operations. Also, in providing the information in response to Item No. 273, Southern Bell is not waiving its previous general objection to the relevance of information pertaining to unregulated products, services, or operations.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory responses of the information designated by Southern Bell as confidential.

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

4. Attached as Attachment C is a sealed envelope containing copies of the Interrogatory responses with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding certain portions of Southern Bell's responses to Interrogatory Item Nos. 258, and 264, these responses are in part entitled to proprietary confidential classification because they contain information concerning Southern Bell's IXC customers' individual usage of the Company's access services provided to the IXCs. Customer-specific network usage information of this nature, although compiled in this case for purposes of determining whether and to what extent the various IXCs have properly reported PIU, is nevertheless considered proprietary confidential business information by Southern Bell's IXC customers.

6. Also, in Item Nos. 258 and 264, the Staff seeks the results of the individual PIU audits conducted by Southern Bell in Florida, including specific amounts recovered from individual IXCs as a result of PIU audit findings. While Southern Bell has provided the total intrastate revenue effect of these audits for 1991 and 1992, the individual IXC-specific results are proprietary, and the public disclosure of this customer-specific proprietary information should not be compelled. In order to obtain IXC cooperation, Southern Bell enters into confidentiality

agreements with the IXC's it audits in these cases and is therefore under an obligation not to publicly disclose the individual details of such audits. It is well documented that some IXC's are not particularly cooperative in these auditing efforts, and the confidentiality agreements are often the vehicles to obtain such cooperation. Section 364.183(3), Florida Statutes, specifically provides that proprietary confidential business information includes information disclosed pursuant to a "...private agreement that provides that the information will not be released to the public." If this PIU audit information were compelled to be publicly released, the result would likely be that Southern Bell would encounter increased difficulty in obtaining cooperation in these crucial audits. Such a result would not be in the public interest because the reason for these audits is to ensure that Southern Bell is being properly compensated for the relative percentages of intrastate and interstate access services provided to IXC's in Florida. To the extent PIU is overstated and left undetected, Southern Bell's regulated intrastate revenues would be negatively affected, thereby causing harm to Southern Bell and ultimately its ratepayers.

7. Regarding Southern Bell's response to Interrogatory Item No. 273, this response contains competitively sensitive information relating to the directory advertising operations of one of Southern Bell's unregulated affiliates, BellSouth Advertising and Publishing Company ("BAPCO"), and as such the information contained therein is proprietary confidential

business information. These responses contain actual unregulated investment as well as net income information.

8. The directory advertising business is a competitive business, and companies participating in that market do not typically share their capital investment and profit margins with their competitors. Section 364.183(3)(e), Florida Statutes, specifically includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as proprietary confidential business information. Knowledge of discrete elements in a competitor's cost structure, such as current investment costs in the context of the directory advertising business, would make it easier to estimate the competitor's overall costs which must be covered through advertising revenues. Consequently, knowledge of a competitor's costs could help in setting strategic advertising rates in certain markets subject to the greatest competition.

9. Interrogatory Response No. 273 also contains non-regulated net income information. Knowledge of another competitor's profitability clearly places the firm possessing such knowledge in a superior position relative to the other company. Such knowledge could be valuable to competitors since it discloses financial results and could give insight into future expectations concerning the competitive efforts of others. Accordingly, disclosure would give others a competitive advantage which would result in competitive harm and impair the effectiveness of Southern Bell's unregulated affiliate's

directory advertising business. If BAPCO's revenue stream were to be adversely affected, then Southern Bell's share of these total revenues could also be diminished, resulting in an adverse impact on Southern Bell's regulated revenues in the State of Florida.

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.

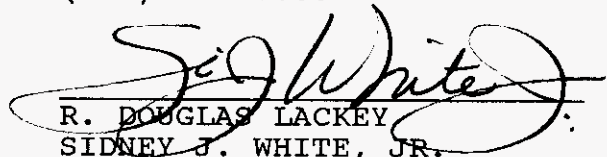
WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 30th day of October, 1992.

SOUTHERN BELL TELEPHONE
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FPSC DOCKET 920260-TL
FPSC STAFF'S 7th REQUEST FOR DOCUMENTS

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

REASONS:

The documents furnished the Staff in response to this request contain customer specific information, forecasted information on useage, market share, and/or revenues of services that are competitive and are considered Proprietary and Confidential Business Information by Southern Bell.

LOCATION OF THE PROPRIETARY INFORMATION

The proprietary information is identified by page and line numbers as follows:

Interrogatory Number	Line Number
258	10, 12-21, 2327, 29
264	21-37
273	31, 34