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December 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-DATE
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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 December, 1992 to:

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A handwritten signature in cursive script, appearing to read "J. J. White". The signature is written in black ink and is positioned in the lower right quadrant of the page.

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: December 30, 1992
Company)
_____)

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 Sixteenth Set of Interrogatories dated November 25, 1992.

1. Southern Bell is filing its Request for Confidential Classification for Interrogatory Response No. 427(a), which contains certain information pertaining to competitive intraLATA toll services.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory response 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 response with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing a copy of the Interrogatory response 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 Southern Bell's response to Interrogatory Item No. 427(a), this response is entitled to proprietary confidential

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classification because it contains statistical distributions of Southern Bell's intraLATA toll revenues by mileage band and time of day. This information discloses usage patterns and demand levels for certain classes of Southern Bell customers and shows the corresponding mileage for intraLATA calls made by these customers. The intraLATA toll market is a competitive arena. Competitors could use this information to selectively target their marketing strategies and pricing to appeal to key customer bases, thereby depriving Southern Bell of similar business opportunities. Thus, the disclosure of this competitive toll market information would impair Southern Bell's ability to compete in the intraLATA toll market. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider. The information contained in Southern Bell's response to Item No. 427(a), as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. 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 December, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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FPSC DOCKET 920260-TLFPSC STAFF'S 16TH SET OF INTERROGATORIES**EXPLANATION FOR PROPRIETARY INFORMATION**

This information reflects projected revenues and, therefore, demand for Southern Bell's intraLATA MTS service. If this information were given to a competitor he would know how much demand exists for this Southern Bell service, thus telling the competitor he too should begin offering these services. This information is valuable, and is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. It also relates to competitive services provided by the company. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes. In addition, this information represents research performed by Southern Bell which should not be given free of charge to entities which compete with Southern Bell. Southern Bell compiled and developed this information in order to assist it in analyzing this subject matter. Southern Bell's competitors should not be allowed to benefit from research performed at Southern Bell's expense.

LOCATION OF THE PROPRIETARY INFORMATION

Southern Bell's response to Item 427(a) of Staff's Sixteenth Set of Interrogatories.

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>
3	6-11, 17, Cols. A-H; 13-16, Cols. A,C,E,G
4	6-11, Cols. A-H; 13-16, Cols. A,C,E,G
5	6-11, 17 Cols. A-H; 13-16, Cols. A,C,E,G
6	6-11, Cols. A-H; 13-16, Cols. A,C,E,G
7	6-11, 17 Cols. A-H; 13-16, Cols. A,C,E,G
8	6-11, Cols. A-H; 13-16, Cols. A,C,E,G
9	3-5, Cols. B-D
10	5-7, 9-11, 13-15 Cols. B-C
11	5-7, 9-11, 13-15 Cols. B-C
12	5-7, 9-11, 13-15 Cols. B-C