

NANCY B. WHITE  
General Attorney

Southern Bell Telephone  
and Telegraph Company  
Suite 400  
150 South Monroe Street  
Tallahassee, Florida 32301  
(404) 529-5387

February 4, 1993

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,

*Nancy B. White*  
Nancy B. White

Enclosures

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

SEARCHED  
*LCW*  
INDEXED  
SERIALIZED  
FILED  
FPC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
01411 FEB-4 83  
FPC-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 4th day of February, 1993 to:

Robin Norton  
Division of Communications  
Florida Public Svc Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0866

Angela Green  
Division of Legal Services  
Florida Public Svc Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0863

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Grandoff & Reeves  
716 - 315 S. Calhoun Street  
Tallahassee, Florida 32301  
atty for FIXCA

Patrick K. Wiggins  
Wiggins & Villacorta, P.A.  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
atty for Intermedia

Joseph Gillan  
J. P. Gillan and Associates  
Post Office Box 541038  
Orlando, Florida 32854-1038

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

Floyd R. Self, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis, & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
attys for McCaw Cellular

Michael J. Henry  
MCI Telecommunications Corp.  
MCI Center  
Three Ravinia Drive  
Atlanta, Georgia 30346-2102

Richard D. Melson  
Hopping Boyd Green & Sams  
Post Office Box 6526  
Tallahassee, Florida 32314  
atty for MCI

Rick Wright  
Regulatory Analyst  
Division of Audit and Finance  
Florida Public Svc Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0865

Peter M. Dunbar  
Haben, Culpepper, Dunbar  
& French, P.A.  
Post Office Box 10095  
Tallahassee, FL 32301  
atty for FCTA

Chanthina R. Bryant  
Sprint  
3065 Cumberland Circle  
Atlanta, GA 30339

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
Suite 1410  
106 East College Avenue  
Tallahassee, Florida 32301

Dan B. Hendrickson  
Post Office Box 1201  
Tallahassee, FL 32302  
atty for FCAN

Benjamin H. Dickens, Jr.  
Blooston, Mordkofsky, Jackson,  
& Dickens  
2120 L Street, N.W.  
Washington, DC 20037

Monte Belote  
Florida Consumer Action Network  
4100 W. Kennedy Blvd. #128  
Tampa, FL 33609

Michael B. Twomey  
Assistant Attorney General  
Department of Legal Affairs  
Room 1603, The Capitol  
Tallahassee, FL 32399-1050

Florida Pay Telephone  
Association, Inc.  
c/o Mr. Lance C. Norris  
President  
202 - 8130 Baymeadows Cir. West  
Jacksonville, FL 32256

Mr. Cecil O. Simpson  
General Attorney  
Mr. Peter Q. Nyce, Jr.  
General Attorney  
Regulatory Law Office  
Advocate General  
Department of the Army  
901 North Stuart Street  
Arlington VA 22203-1837

Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508

Douglas S. Metcalf (Ad Hoc)  
Communications Consultants, Inc.  
P.O. Box 1148  
Winter Park, FL 32790-1148

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs, Odom &  
Ervin  
305 South Gadsen Street  
Tallahassee, FL 32302  
atty for Sprint

Laura L. Wilson, Esq.  
Messer, Vickers, Caparello,  
Madsen, Lewis & Metz, PA  
Post Office Box 1876  
Tallahassee, FL 32302  
atty for FPTA

Mr. Michael Fannon  
Cellular One  
2735 Captial Circle, N.E.  
Tallahassee, FL 32308

Nancy B. White

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: February 4, 1993  
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 the Company's Responses to Item No. 174 and 176 of Staff's Eighteenth Request for Production of Documents dated December 15, 1992.

1. Southern Bell is filing its Request for Confidential Classification for its Response to Production of Documents Request No. 174 and 176 because it deems the information requested as confidential and proprietary business in that it reflects competitive CPE information, complaint settlements, and tax return information still under review by the Internal Revenue Service. Disclosure of this information would impair Southern Bell's ability to compete and to settle interexchange company complaints.

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

DOCUMENT NUMBER-DATE

01411 FEB-48

FPSC-REGULATORY/REPORTING

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

4. Attached as Attachment C is a sealed envelope containing copies of the Production of Document 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 Southern Bell's Responses to Production of Documents Request No. 174 and 176, this response is entitled to proprietary confidential classification. The disclosure of competitive CPE market information would impair Southern Bell's ability to compete in the CPE 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. Further, disclosure of information regarding settlements of complaints with interexchange carriers could impair Southern Bell's ability to negotiate in the future. With regard to the tax return information, the returns are still under review by the Internal Revenue Service and should be kept confidential until finalized. The information contained in Southern Bell's Responses to Production of Documents Request No. 174 and 176, 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 4th day of February, 1993.

SOUTHERN BELL TELEPHONE  
AND TELEGRAPH COMPANY

  
HARRIS R. ANTHONY  
J. PHILLIP CARVER  
c/o Marshall M. Criser  
400 - 150 South Monroe Street  
Tallahassee, Florida 32301  
(305) 530-5555

  
R. DOUGLAS LACKEY  
NANCY B. WHITE  
4300 - 675 West Peachtree St.  
Atlanta, Georgia 30375  
(404) 529-5387

ATTACHMENT "A"

FPSC DOCKET 920260-TL  
FPSC STAFF'S 18TH PRODUCTION OF DOCUMENTS  
ITEM NUMBER 174

**EXPLANATION FOR PROPRIETARY INFORMATION**

1. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. In particular, this information discusses aspects of BellSouth's CPE business which have not been publicly disclosed. This information could be used by competitors to harm Southern Bell in its marketing of CPE to customers and disadvantage Southern Bell with its customers. As such, this information is classified as Confidential Business Information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
2. This information relates to settlements of overearning complaints with IXCs in the interstate arena. These settlements are the results of intense negotiations between BellSouth Telecommunications and the respective IXCs. The information is considered confidential.
3. This information relates to proprietary tax return information. The data contained in these tax returns is treated as Proprietary and Confidential Business information by BellSouth and is tightly controlled within the Corporation. These returns are still under review by the IRS and are subject to revision until finally approved and should not be released for public disclosure until final.

**LOCATION OF THE PROPRIETARY INFORMATION**

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
F01B18Z00138	6, 7, 14, 15, 19, 20, 30, 31 Cols. B&D, 5, 7, 8, 10, 13, 15 17, 18, 20-22, 24-26, 29, 31, 32, 34-36 Cols. C&E, 51 Cols. A&E, 39, 40, 44, 52, 53, 56, 57, 61, 62 Col. B, 42, 48 Col. D, 12, 27, 43, 52, 53, 56, 60-62 Col. E	3
F01B18Z00139	9-35 Col. B	3
F01B18Z00140	10-51 Col. B	3
F01B18Z00141	10-43 Col. B	3
F01B18Z00142	9-37 Col. B	3
F01B18Z00143	10-51 Col. B	3

ATTACHMENT "A"

FPSC DOCKET 920260-TL  
 FPSC STAFF'S 18TH PRODUCTION OF DOCUMENTS  
 ITEM NUMBER 174

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
F01B18Z00144	10-37 Col. B	3
F01B18Z00145	6, 7, 15, 16, 20, 21, 31, 32 Cols. B&D, 5, 7, 8, 11, 13, 14, 16, 18, 19, 21-23, 25-30, 32, 33, 35-37 Col. C, 5, 7-11, 14, 16, 18, 19, 21-23, 25-27, 29, 30, 32, 33, 35-37, 44, 53-55, 58, 62-64 Col. E, 53 Col. A, 40-42, 45, 54-55, 58, 59, 63, 64 Col. B, 43, 50 Col. D	3
F01B18Z00146	9-38 Col. B	3
F01B18Z00147	9-51 Col. B	3
F01B18Z00148	9-47 Col. B	3
F01B18Z00149	9-37 Col. B	3
F01B18Z00150	9-51 Col. B	3
F01B18Z00151	9-36 Col. B	3
F01B18Z00152	6, 7, 15, 16, 20, 21, 31, 32 Col. B&D, 5, 7-11, 14, 16, 18, 19, 21-23, 25-27, 29, 30, 32, 33, 35-37 Cols. C&E, 53 Cols. A&E, 40, 41, 45, 54, 55, 58, 59, 63, 64 Col. B, 43, 50 Col. D, 44, 54, 55, 58, 60, 62-64 Col. E	3
F01B18Z00153	10-50 Col. B	3
F01B18Z00154	10-52 Col. B	3
F01B18Z00155	10-52 Col. B	3
F01B18Z00156	10-13 Col. B	3
F01B18Z00157	10-48 Col. B	3
F01B18Z00158	10-52 Col. B	3
F01B18Z00159	10-38 Col. B	3



ATTACHMENT "A"

FPSC DOCKET 920260-TL  
FPSC STAFF'S 18TH PRODUCTION OF DOCUMENTS  
ITEM NUMBER 176

**EXPLANATION FOR PROPRIETARY INFORMATION**

1. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. In particular, this information discusses aspects of BellSouth's CPE business which have not been publicly disclosed. This information could be used by competitors to harm Southern Bell in its marketing of CPE to customers and disadvantage Southern Bell with its customers. As such, this information is classified as Confidential Business Information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
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**LOCATION OF THE PROPRIETARY INFORMATION**

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
F01B18Z0000249	2, 8, 9, 11, 12, 14, 18	1
F01B18Z0000252	45, 46 Cols. C&D	1
F01B18Z0000253	6-46 Cols. C&D, 47	1
F01B18Z0000254	6, 7, 9, 10, 15-18 Col. I, 24-26 Col. J, 4, 6, 7, 9, 10, 15-20 Col. N	1
F01B18Z0000255	3-4 Cols. C&D, 17 Cols. B&C	1
F01B18Z0000256	4-68 Col. F	1
F01B18Z0000257	4-16 Col. F	1
F01B18Z0000258	4-17 Col. F, 38-41	1
F01B18Z0000288	18, 22, 24, 27 Col. B, 17, 21 23, 26 Col. C	1
F01B18Z0000290	5-36 Cols. C&D	1
F01B18Z0000291	4-16 Cols. C&D	1
F01B18Z0000436	10 Cols. B-E&G, 20 Cols. A-D&F	2
F01B18Z0000437	11 Col. A	2

ATTACHMENT "A"

FPSC DOCKET 920260-TL  
FPSC STAFF'S 18TH PRODUCTION OF DOCUMENTS  
ITEM NUMBER 176

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
F01B18Z0000449	9 Cols. B-G, 19 Cols. A-F	2
F01B18Z0000450	11, 12, 18	2
F01B18Z0000479	9 Cols. B-G, 18 Cols. A-F	2
F01B18Z0000480	11, 12, 15, 18	2
F01B18Z0000515	11	2
F01B18Z0000516	10	2, 1

ATTACHMENT "B"

Two edited copies of the Production of Document responses with the confidential information deleted.

ATTACHMENT "C"

One copy of the Production of Document responses with the material which is confidential and proprietary highlighted.