

NANCY B. WHITE  
General Attorney

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

February 5, 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 and Motion for a Permanent Protective Order. 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

Enclosures

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

RECEIVED & FILED

  
EPSC RECORDS

DOCUMENT NUMBER-DATE

01484 FEB-58

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 5th 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

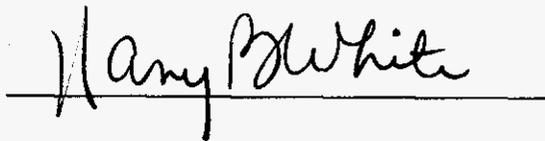
Bill L. Bryant, Jr., Esq.  
Foley & Lardner  
Suite 450  
215 South Monroe Street  
Tallahassee, FL 32302-0508

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

  
\_\_\_\_\_

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 5, 1993  
Company )  
\_\_\_\_\_ )

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 exhibits attached to the panel deposition of Anthony Lombardo taken on January 12, 1993. In support of its Request and Motion, Southern Bell shows the following:

1. On January 12, 1993, the Staff of the Florida Public Service Commission conducted a deposition of Anthony Lombardo, an employee of Southern Bell. During the course of the deposition, several parties either requested Late filed exhibits or used as exhibits certain documents delivered to the parties in response to discovery requests. Exhibits 28, 29, 30, and 33 were the subject of a Request for Confidential Classification and Motion for Permanent Protective Order filed herein on November 16, 1992.

2. Southern Bell has now gathered Exhibits 12-15, 17-20, 23-24, 26-27 and 32 which contain confidential information and therefore, Southern Bell herewith files its Request for

DOCUMENT NUMBER-DATE  
01484 FEB-5 93  
PFSO-RECORDS/REPORTING

Confidential Classification and its Motion for Permanent Protective Order for the information contained in the documents delivered to the parties. 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, together with a statement indicating why the material should be treated as confidential proprietary business information.

3. Appended hereto in an envelope designated as Attachment "B" are two copies of the document with the confidential information deleted. Appended hereto in an envelope designated as Attachment "C" are copies of the documents with the proprietary information highlighted.

4. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains competitive intralata toll market information, strategic and business planning information, and information concerning possible competitive responses. Any competitor or potential competitor would benefit from possession of this information. Possession of this information would assist Southern Bell's competitors in establishing pricing strategies and developing business cases. 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.

5. 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.

6. 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.

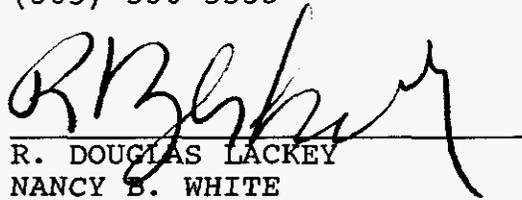
WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached exhibits, to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 5th day of February, 1993.

ATTORNEYS FOR SOUTHERN BELL  
TELEPHONE AND TELEGRAPH COMPANY



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



R. DOUGLAS LACKEY  
NANCY B. WHITE  
4300 Southern Bell Center  
675 West Peachtree St., N.E.  
Atlanta, Georgia 30375  
(404) 529-3862  
(404) 529-5387

**ATTACHMENT A  
LOCATION OF PROPRIETARY MATERIAL**

**LOMBARDO'S DEPOSITION EXHIBIT NO. 12  
DOCKET 920260-TL  
JANUARY 12, 1993**

The mileage band data found in these attached reports, on pages 1 through 18 as indicated below, are considered by Southern Bell to be proprietary and confidential in that this material reveals competitive intraLATA toll market information.

Lines 5 through 19, columns B through E, page 1

Columns A through G, pages 2, 3, 5, 6, 8, 9, 11, 12

Columns A through D, pages 4, 7, 10, 13

Mileage Band Graph on page 14

Lines 5 through 15, column B, pages 15 and 16

Lines 6 through 11, columns B & D, pages 17 and 18

**ATTACHMENT A  
LOCATION OF PROPRIETARY MATERIAL**

**LOMBARDO'S DEPOSITION EXHIBIT  
NOS. 13, 17, 24, 26  
DOCKET 920260-TL  
JANUARY 12, 1993**

The material found in these exhibits is considered by Southern Bell to be proprietary and confidential business information. Disclosure of this material would reveal to competitors, Southern Bell's strategies and business plans used in negotiations with competitors.

<u>Page Number</u>	<u>Line Number</u>
<b>Exhibit 13</b>	
F01C01Z360	5-20, 22-24, 27
F01C01Z361	4-24, 26-28, 31
F01C01Z362	4-8
<b>Exhibit 17</b>	
F01C01Z367	4-28
F01C01Z368	6, 7, 10, 11, 14-16, 19-21
F01C01Z369	3, 4, 7, 8
F01C01Z370	5, 6, 8, 9, 15, 16, 18, 19, 21, 22, 25-27
F01C01Z371	5-10, 12-16
F01C01Z372	2-14, 16-20, 22
F01C01Z373	4-28
F01C01Z374	2, 3, 4, 7, 8, 9
F01C01Z375	3, 4
<b>Exhibit 24</b>	
F01C01Z376	5-23
F01C01Z377	5-26
<b>Exhibit 26</b>	
F01C01Z404	4-18
F01C01Z405	4-22
F01C01Z408	5, 7, 9, 10, 12, 13, 14, 16, 17
F01C01Z409	21, 22

**ATTACHMENT A  
LOCATION OF PROPRIETARY MATERIAL**

**LOMBARDO'S DEPOSITION EXHIBIT  
NOS. 14, 15, 18, 19, 20, 23, 25, 27  
DOCKET 920260-TL  
JANUARY 12, 1993**

The material found in these exhibits is considered by Southern Bell to be proprietary and confidential business information. Disclosure of this material would reveal to competitors, Southern Bell's strategies and business plans used in negotiations with competitors.

**INDEX OF PROPRIETARY MATERIAL**

Late Filed Exhibit 14	Page 1; Lines 11-30
Late Filed Exhibit 15	Page 1; Lines 10, 12-14
Late Filed Exhibit 18	Page 1; Lines 9-12
Late Filed Exhibit 19	Page 1; Lines 7, 10-19
Late Filed Exhibit 20	Page 1; Lines 13-17
Late Filed Exhibit 23	Page 1; Lines 8, 10, 11
Late Filed Exhibit 25	Page 1; Lines 13-24
Late Filed Exhibit 27	Page 1; Lines 9, 10, 12, 13

**ATTACHMENT A  
LOCATION OF PROPRIETARY MATERIAL**

**LOMBARDO'S DEPOSITION EXHIBIT NO. 32  
DOCKET 920260-TL  
JANUARY 12, 1993**

The graph on page F03C02Z 00122 is considered by Southern Bell to be proprietary and confidential business information in that this material reveals BellSouth's projection of potential outcomes resulting from various responses to competition in its intraLATA toll market.

ATTACHMENT A  
Location of Proprietary Material

Lombardo's Deposition Exhibit No. 12  
Docket 920260-TL  
January 12, 1993

The mileage band data found in these attached reports, on pages 1 through 18 as indicated below, are considered by Southern Bell to be proprietary and confidential in that this material reveals competitive intraLATA toll market information.

Lines 5 through 19, columns B through E, page 1

Columns A through G, pages 2, 3, 5, 6, 8, 9, 11, 12

Columns A through D, pages 4, 7, 10, 13

Mileage Band Graph on page 14

Lines 5 through 15, column B, pages 15 & 16

Lines 6 through 11, columns B & D, pages 17 & 18

ATTACHMENT A  
Location of Proprietary Material

Lombardo's Deposition Exhibits  
Nos. 13, 17, 24, 26  
Docket 920260-TL  
January 12, 1993

The material found in these exhibits is considered by Southern Bell to be proprietary and confidential business information. Disclosure of this material would reveal to competitors, Southern Bell's strategies and business plans used in negotiations with competitors.

<u>Page Number</u>	<u>Line number(s)</u>
<b>Exhibit 13</b>	
F01C01Z 360	5-20, 22-24, 27
" 361	4-24, 26-28, 31
" 366	4-8
<b>Exhibit 17</b>	
F01C01Z 367	4-28
" 368	6, 7, 10, 11, 14-16, 19-21
" 369	3, 4, 7, 8
" 370	5, 6, 8, 9, 15, 16, 18, 19, 21, 22, 25-27
" 371	5-10, 12-16
" 372	2-14, 16-20, 22
" 373	4-28
" 374	2, 3, 4, 7, 8, 9
" 375	3, 4
<b>Exhibit 24</b>	
F01C01Z 376	5-23
" 377	5-26
<b>Exhibit 26</b>	
F01C01Z 404	4-18
" 405	4-22
" 408	3-20
" 409	5, 7, 9, 10, 12, 13, 14, 16, 17, 21, 22

**ATTACHMENT A  
LOCATION OF PROPRIETARY MATERIAL**

**LOMBARDO'S DEPOSITION EXHIBIT  
NOS. 14, 15, 18, 19, 20, 23, 27  
DOCKET 920260-TL  
JANUARY 12, 1993**

The material found in these exhibits is considered by Southern Bell to be proprietary and confidential business information. Disclosure of this material would reveal to competitors, Southern Bell's strategies and business plans used in negotiations with competitors.

**INDEX OF PROPRIETARY MATERIAL**

Late Filed Exhibit 14	Page 1; Lines 11-30
Late Filed Exhibit 15	Page 1; Lines 10, 12-14
Late Filed Exhibit 18	Page 1; Lines 9-12
Late Filed Exhibit 19	Page 1; Lines 7, 10-19
Late Filed Exhibit 20	Page 1; Lines 13-17
Late Filed Exhibit 23	Page 1; Lines 8, 10, 11
Late Filed Exhibit 27	Page 1; Lines 9, 10, 12, 13

ATTACHMENT A  
Location of Proprietary Material

Lombardo's Deposition Exhibit No. 32  
Docket 920260-TL  
January 12, 1993

The graph on page F03C02Z 00122 is considered by Southern Bell to be proprietary and confidential business information in that this material reveals BellSouth's projection of potential outcomes resulting from various responses to competition in its intraLATA toll market.