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February 22, 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 Supplemental 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

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FPSC BUREAU OF RECORDS

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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 22nd day of February, 1993 to:

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Florida Public Svc Commission
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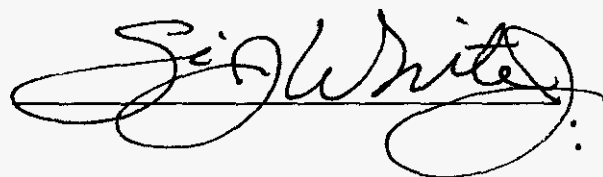
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A handwritten signature in black ink, appearing to read "Jim White". The signature is written in a cursive style with a large, looping initial "J" and a long horizontal stroke extending to the right. There is a small mark at the end of the signature.

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 22, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
SUPPLEMENTAL 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(3)(a) and (4), Florida Administrative Code, and files its Supplemental Request for Confidential Classification for certain information contained in Staff's Rate Case Audit workpapers.

1. On December 23, 1992, Southern Bell filed its original Request for Confidential Classification relating to the Staff's Rate Case Audit report and workpapers.

2. On January 15, 1993, Commissioner Clark ruled Order No. PSC-93-0071-TCO-TL that certain documents that had been produced by Southern Bell in this docket, and which had information redacted from such documents, should be reproduced without such information redacted. To the extent the information was otherwise proprietary confidential business information, Southern Bell was permitted an opportunity to file for the necessary confidential classification.

3. Some of the Rate Case Audit workpaper documents previously submitted had originally been redacted according to the practice followed prior to Commissioner Clark's ruling. consequently, the pertinent pages of such documents were requested to be resubmitted for inclusion in Staffs Rate Case

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FLORIDA PUBLIC SERVICE COMMISSION

Audit workpapers¹ in an unredacted form. The pages being submitted herewith should be substituted for the originally redacted versions of the same pages²

4. This Supplemental Request for Confidential Classification is being filed at Staff's suggestion in order that the record may clearly reflect the reasons supporting the classification of such documents, or portions thereof, as proprietary confidential business information.

5. Pursuant to Rule 25-22-006(3)(a) and (4), Florida Administrative Code, Southern Bell is hereby filing its Supplemental Request for Confidential Classification for certain substitute pages of Staff's Rate Case Audit workpapers. These documents contain affiliate company information and independent company settlement information.

6. Attachment A is a listing showing the location in the Rate Case Audit workpaper documents of the information designated by Southern Bell as confidential.³

¹Southern Bell attempted to do this on January 18, 1993, but apparently due to compilation or collation errors the package submitted did not contain all necessary documents or appropriate indices to enable Staff to properly assess the reasonableness of Southern Bell's request for confidentiality for the set of documents.

²The substitute sheets are clearly "Bates Labeled" at the bottom right hand corner of the page. These page numbers correspond to and should match the original sheets provided.

³For Staff's convenience, Southern Bell is submitting a completely revised index covering all information contained in the Staffs Rate Case Audit workpapers for which Southern Bell is requesting confidential classification including the substitute pages being submitted herewith. This Index can be substituted in its entirety for any previous index submitted.

7. Attachment B contains two edited copies of the substitute pages with the confidential information deleted.

8. Attachment C is a sealed package containing copies of the substitute pages with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

RATE CASE AUDIT PHASE ("RATE CASE")

9. With request to the substitute pages specifically identified in Attachment A as containing financial and other information regarding Southern Bell's non-regulated affiliate companies, this information is entitled to confidential classification because it relates to competitive interests of unregulated companies, the disclosure of which would harm the competitive interests of such companies. The information includes revenues, expenses or investment in these non-regulated enterprises. This information could be used by competitors to determine entry level strategy, cost structure and revenue potential for these competitive products or services. Southern Bell's non-regulated affiliates do not have access to this same type of information from its competitors. Consequently, to the extent that information otherwise unavailable publicly were to be forceably compelled to be disclosed, Southern Bell's non-regulated competitors would be placed at a competitive disadvantage vis-a-vis their competitors. Section 364.183(e), Florida Statutes, provides that this information is proprietary confidential business information exempt from the public

inspection and examination provisions of Section 119.07(1), Florida Statutes.

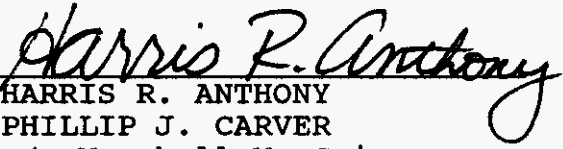
10. With respect to the substitute pages specifically identified in Attachment A as containing information relating to Southern Bell and other telephone company intercompany settlement matters, this information is entitled to confidential classification because it contains information which would disclose demand, revenues and other market information relating to competitive toll markets serviced by the various parties, other intercompany serving arrangements, and billing related information. Southern Bell maintains this information for these non-affiliated companies/customers with the understanding that such information is proprietary confidential business information not to be publicly disclosed without the express permission of these companies. Section 364.183(3), provides that information which is subject to a private agreement providing for non-disclosure is proprietary confidential business information exempt from Section 111.07(1) Florida Statutes. Furthermore, to the extent this information contains customer specific carrier billing and other information, such information is considered proprietary confidential business information pursuant both to longstanding Commission policy as well as to the Commission's CPNI rules.


11. Southern Bell has treated and intends to continue to treat this 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 22nd day of February, 1993.

SOUTHERN BELL TELEPHONE
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FPSC DOCKET 920260-TL

Attachment A for "Rate Case Audit"

Index of Confidential Materials and
List of Reasons Why Specific Materials Are Proprietary

A. This information relates to internal audit controls and reports of internal auditors and includes information consisting of, or which incorporates, materials from internal audits and/or workpapers of internal auditors. The information from internal audits should be treated as confidential because Section 364.183, Florida Statutes, cites internal audits as an example of the type of information that should be accorded confidential treatment.

B. This information reflects employee personnel information unrelated to compensation, duties, qualifications or responsibilities. 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.

C. This information relates to Southern Bell's unregulated products and services, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. This includes information relating to the revenues, expenses or investment in these unregulated products and services. This information could be used by competitors to harm Southern Bell in its marketing of its unregulated products and services. 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.

D. This information may reflect intraLATA Private Line and toll settlements between Southern Bell and other independent telephone companies in Florida. These other companies strive to keep this information confidential because it reflects usage in a competitive toll market. Also, Southern Bell through private agreement, is not at liberty to publicly disclose this information pertaining to these independent companies. Section 364.183(3), provides that such information is proprietary confidential business information. This information may also reflect financial and other data concerning BellSouth affiliated companies' unregulated operations. The companies would be reluctant to provide this information to Southern Bell if they knew this information would be made available to their competitors. These companies treat this information as proprietary business information. Thus, public disclosure would adversely effect the competitive interests of these companies, and is therefore proprietary confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

ATTACHMENT A
 STAFF RATE CASE AUDIT
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ITEM NO.	PAGE NO.	LINE NO.	COLUMNS	REASON
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F01B01W	000069	8-12, 15-22, 24-27, 32-39	J	A
F01B01W	000070	7-13	J	A
F01B01W	000071	7-13	J	A
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F01B01W	000090	ENTIRE PAGE		A

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F01B01W	000198	17-26		A
F01B01W	000199	10-33		A
F01B01W	000200	7-11		A
F01B01W	000201	23-42		A
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F01B01W	000204	13-21, 27-39		A
F01B01W	000205	6-11		A
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F01B01W	000212	36-37		A
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F01B01W	000447	10-11		D
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F01B01W	001225	5-45	C-D	C
F01B01W	001226	7-47	C-D	C
F01B01W	001227	7-8, 9-10, 12-17, 18-19	C-O	C
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F01B01W	001256	1-30	C-D	C
F01B01W	001257	1-22	C-D	C
F01B01W	001258	6-37	C-D	C
F01B01W	001262	16-25, 27-28	B-C	C
F01B01W	001263	13, 15-16	B-C	C
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F01B01W	001892	11-15, 18-20, 22-24, 26-31		C
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F01B01W	002018	21, 23, 25, 27		C
F01B01W	002019	21, 23, 25, 27		C
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F01B01W	002080	25, 28, 34, 38, 41	B-D, F	D
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F01B01W	002089	15, 28, 30-36, 58-59	C, D, N	D
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F01B01W	002109	7-9		D
F01B01W	002110	7-9		D
F01B01W	002111	23, 26, 37		D
F01B01W	002112	13, 15		D
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F01B01W	002189	8-19	A-C	D
F01B01W	002190	12-20, 22-26	B, D	D
F01B01W	002191	13-18	B, D	D
F01B01W	002194	12-20, 22-30	B, D	D
F01B01W	002195	12-20, 22-26	B, D	D
F01B01W	002196	13-18	B, D	D
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F01B01W	002235	25		F
F01B01W	002250	14-17		A
F01B01W	002251	ENTIRE PAGE		A
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F01B01W	002687	7-18	A-L	D
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