NANCY B. WHITE General Attorney

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

February 25, 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, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

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

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.

Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony R. D. Lackey

DOCUMENT NUMBER-DATE

02199 FEB 25 8

CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 900960-TL Docket No. 910163-TL Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 25th day of February, 1993 to:

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Florida Public Service
Commission
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Tallahassee, FL 32399-0866

Tracy Hatch Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

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ManyMuhita

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company

Docket No. 900960-TL

Docket No. 920260-TL

In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

In re: Petition on behalf of) Docket No. 910163-TL Citizens of the State of Florida) to initiate investigation into)

integrity of Southern Bell
Telephone and Telegraph Company's
repair service activities and
reports

In re: Investigation into Southern Bell Telephone and Telegraph Company's compliance

with Rule 25-4.110(2), F.A.C., Rebates

Docket No. 910727-TL

Filed: February 25, 1993

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 Code, and files its Request for Confidential Classification regarding a certain late-filed exhibit requested by Staff at the deposition of R. G. Barrere taken on February 9, 1993. In support of its Request, Southern Bell shows the following:

1. On February 9, 1993, the Staff of the Florida Public Service Commission conducted a deposition of R. G. Barrere, an employee of Southern Bell. During the course of the deposition, Staff requested that Mr. Barrere submit a certain late-filed exhibit.

- 2. Southern Bell has now gathered the exhibits, that being Exhibit No. 1, which contains confidential information.

 Therefore, Southern Bell herewith files its Request for Confidential Classification for the information contained in the documents being delivered to Staff.
- 4. 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 statements indicating why the material should be treated as proprietary confidential business information.
- 5. Appended hereto in an envelope designated as Attachment "B" are two copies of the documents with the confidential information deleted.
- 6. Appended hereto in an envelope designated as Attachment "C" are copies of the documents with the proprietary information highlighted.
- 7. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains, among other things, information developed at a significant cost solely for the internal use of Southern Bell. The information represents research developed for Southern Bell which should not be given free of charge to entities which compete with Southern Bell. Possession of this information would assist Southern Bell's competitors in establishing customer strategies. Therefore, under § 364.183, Florida Statutes, this information is exempt

from the Open Records Act as a trade secret.

8. 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 exhibit, to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 25th day of February, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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c/o Marshall M. Criser

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ATTACHMENT "A"

INDEX AND JUSTIFICATION FOR CONFIDENTIALITY REQUEST

RE: FEBRUARY 9, 1993 DEPOSITION

LATE FILED EXHIBIT OF R. G. BARRERE

This information was developed at a significant cost solely for the internal use of Southern Bell. In that this information represents research performed by Southern Bell, it should not be given free of charge to entities which compete with Southern Bell. Specifically, Southern Bell has compiled and developed these questionnaires in order to assist it in analyzing its billing, provisioning, repair, and directory assistance operations. As such, this information is valuable, and is used by the Company in conducting its business and Southern Bell strives to keep it secret. As such, this information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes.

All the material on each page of the document covering pages F01B09V 0000001 through F01B09V 0000039 is considered by Southern Bell to be proprietary and confidential business information.