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March 10, 1993

Mr. Steve C. Tribble
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Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

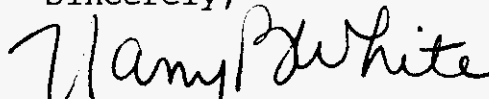
RE: Docket No. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for a Permanent Protective Order. 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.

Sincerely,


Nancy B. White

Enclosures

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

DOCUMENT NUMBER-DATE

02697 MAR 10 88

FPSC-RECORDS/REPORTING

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 10th day of March, 1993 to:

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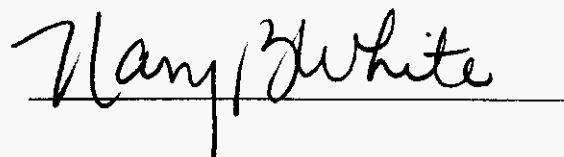
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Mary White

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. 920260-TL
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In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers)	Docket No. 900960-TL
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In re: Petition on behalf of Citizens of the State of Florida to initiate investigation into integrity of Southern Bell Telephone and Telegraph Company's repair service activities and reports)	Docket No. 910163-TL
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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: March 10, 1993

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 documents requested by the Office of Public Counsel ("Public Counsel") in Public Counsel's Request for Production of Documents, Items F01A23Z 00436 to 00446. In support of its Request and Motion, Southern Bell shows the following:

1. During the course of this proceeding, Public Counsel

has conducted discovery of Southern Bell. Copies have been reviewed inspected by Public Counsel in response to Public Counsel's requests for production of documents and interrogatories.

2. Public Counsel has now advised Southern Bell that Public Counsel desires to use certain documents at the hearings in this proceeding, and, therefore, Southern Bell herewith files its Request for Confidential Classification and its Motion for Permanent Protective Order for the information contained in the documents to be so used. 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 documents with the confidential information deleted. Appended hereto in an envelope designated as Attachment "C" is a copy of the documents with the proprietary information highlighted.

4. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains future force reduction plans. The plans are subject to change. Premature release of this information could cause employee anxiety and affect trading in BellSouth stock. Any competitor or potential competitor would benefit from possession of this information.

5. This information has been developed by Southern Bell at considerable time and expense and is not readily ascertainable by third parties 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 proprietary confidential business information pursuant to § 364.183, Florida Statutes, and which is 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.

7. 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.

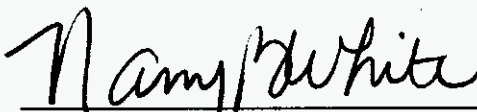
WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached exhibits, to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 10th day of March, 1993.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY



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ATTACHMENT "A"

FPSC DOCKET NO. 920260-TL
PUBLIC COUNSEL HEARING EXHIBIT DOCUMENTS

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

- A. This information reflects projected units and/or revenues for competitive services and, therefore, demand for certain Southern Bell services. If this information were given to a competitor he would know how much growth Southern Bell expects in a particular 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. 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.
- B. This information reflects Southern Bell's market strategy. Southern Bell's competitors can use this information to develop their own market strategy with which to thwart Southern Bell's effort in this market. Thus, the disclosure of this information to Southern Bell's competitors would impair Southern Bell's ability to compete. In addition, this information is valuable, it is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183 Florida Statutes.
- C. This information reflects Southern Bell's force reduction plans for the future down to departmental level. Southern Bell strives to keep this information secret and releases the details only to those who need to know. These plans are subject to change and early release of this information will cause employee anxiety. Therefore, Southern Bell treats this information as proprietary, confidential business information which should be classified as such and found to be exempt from the Open Records Act pursuant to Section 364.183 Florida Statutes.

ATTACHMENT "A"

LOCATION OF THE PROPRIETARY INFORMATION

The proprietary information is identified by page and line numbers as follows:

<u>Page Number</u>	<u>Line Number</u>	<u>Reason</u>
F01A01Z 03172-03190	Please refer to Southern Bell's Request for Confidential Classification filed on November 16, 1992 with the FPSC Staff in response to the Staff's Second Production of Document Request.	A, B
F01A01Z 03554-03581	Please refer to Southern Bell's Request for Confidential Classification filed on November 16, 1992 with the FPSC Staff in response to the Staff's Second Production of Document Request.	A, B
F01A23Z 00443	1-17	C
F01A23Z 00444	1-17	C