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May 20, 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,

Sidney J. White, Jr.
Sidney J. White, Jr.

Enclosures

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

Jan

DOCUMENT NUMBER-DATE

05511 MAY 20 83

1700-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 20th day of May, 1993 to:

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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: May 20, 1993
Company)
_____)

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 certain portions of Company responses to Public Counsel's Fourteenth Set of Interrogatories dated February 19, 1993, which were inadvertently sent to Staff in unredacted form.¹

1. Southern Bell is filing its Request for Confidential Classification for portions of Interrogatory Response No. 349 which Staff now has in its possession, which contain projected revenue information relating to the Company's new and proposed discretionary services.

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

¹ In an April 29, 1993 letter, Staff apprised Southern Bell of this oversight and has given Southern Bell the opportunity to rectify the situation through the filing of the instant Request for Confidential Classification.

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

4. Attached as Attachment C is a sealed envelope containing copies of the Interrogatory 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 response to Interrogatory Item No. 349, this response contains a listing of new and proposed discretionary services Southern Bell has brought or is planning to bring to the market. The interrogatory response also contains projected revenues for these new or planned services through the 1994 time frame. This information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes, inasmuch as the information relates to services provided or to be provided in the future for which competing services exist or could exist from alternative providers of service. Consequently, this information relates to competitive interests, the disclosure of which would impair Southern Bell's competitive business.

6. The information in this interrogatory response discloses Southern Bell's view of the market potential for these services, in terms of perceived growth or erosion in revenues, life cycle indices and, for prospective service offerings, the perceived likelihood of successful implementation as indicated through positive revenue growth shown in the pertinent time

frames. Competitive providers of alternative services could gain an unfair market advantage if given public access to these market projections. Further, for prospective services shown in the interrogatory response, Southern Bell's competitors could determine whether or not to seek to compete against certain planned service offerings based on the indicated growth patterns depicted in the response. To the extent growth potential varies, Southern Bell's competitors could likely target their market strategy to focus on the services where the greatest growth potential is indicated by Southern Bell. Any such reactive marketing approaches that result in competing services which take revenues away from Southern Bell would in turn threaten to harm the Company's ratepayers because many of these discretionary services are a source of contribution which help to maintain basic local exchange rates at affordable levels.

7. Southern Bell's competitors do not give the Company access to market projections for their existing and planned services. Similarly, Southern Bell should not be required to publicly disclose the same information. Southern Bell's competitors should be required to make their marketing and service deployment decisions based on their research and analysis, and not based on Southern Bell's similar information compiled internally within Southern Bell.

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

Respectfully submitted this 20th day of May, 1993.

SOUTHERN BELL TELEPHONE
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ATTACHMENT "A"
FPSC DOCKET 920260-TL
PUBLIC COUNSEL'S 14TH SET OF INTERROGATORIES
ITEM NUMBER 349

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

The documents furnished the Staff in response to this request contain projected revenue information relating to Southern Bell's new and proposed discretionary services which are or may be subject to competition from alternative providers of service. Consequently, the information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

LOCATION OF THE PROPRIETARY INFORMATION

The proprietary information is located in columns headed \$ in 1990, \$ in 1991, \$ in 1992, \$ in 1993, \$ in 1994 and is identified by page and item number as follows:

<u>PAGE</u>	<u>ITEM NUMBERS</u>
2 of 8	3-10
3 of 8	11, 13, 15, 16, 17, 22
4 of 8	24-27, 30, 31
5 of 8	32, 35-41
6 of 8	42, 43
7 of 8	51, 52, 56-58
8 of 8	61, 62

ATTACHMENT "B"

Two edited copies of the document with the confidential information deleted.

ATTACHMENT "C"

One copy of the document with the material which is confidential and proprietary highlighted.