

NANCY B. WHITE
General Attorney

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

June 4, 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,

Nancy B. White
Nancy B. White (ef)

1
Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey
1
6
1

[Signature]

DOCUMENT NUMBER-DATE

06048 JUN-48

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: June 4, 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 the diskette provided in response to Item Nos. 427(a) and 427(b) in Staff's Sixteenth Set of Interrogatories dated November 25, 1992.

1. Southern Bell is filing its Request for Confidential Classification for its Response to Interrogatory Item Nos. 427(a) and 427(b) because it deems the information requested as confidential and proprietary business information in that it pertains to intraLATA toll revenues and/or messages segregated by mileage band, time of day and/or class of customer. Because competitors who offer intraLATA services can use this information as a resource, disclosure of this information impairs Southern Bell's ability to compete.

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.

DOCUMENT NUMBER-DATE

05048 JUN-4 93

FLORIDA RECORDS/REGISTRATION

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 Nos. 427(a) and 427(b), this response is entitled to proprietary confidential classification for compelling reasons. First, there can be no dispute that disclosure of this data would allow Southern Bell's competitors to determine the most lucrative areas of Southern Bell's intraLATA toll business. The diskette contains an analysis of customers by class or mileage band or both as well as corresponding toll revenues. By a review of these data, Southern Bell's competitors could, with a minimum of effort, determine customer demand profiles and identify those specific markets of Southern Bell that have heavy customer demand. After having determined the most lucrative markets, a competitor could then target these markets in an effort to siphon off business from Southern Bell. Moreover, the competitor would be able to make its strategic decision based largely on market research done by Southern Bell. Obviously, such an advantage should not be afforded to Southern Bell's competitors.

6. The information contained in these documents includes the number of messages, minutes, revenue, and/or mileage bands

utilized by different market segments in the arena of intraLATA toll services. There can be no question but that Southern Bell's competitors, of which there are many, would be delighted to obtain such data. Under Section 364.183(e), Florida Statutes, this information is clearly proprietary confidential business information. Section 364.183(e) states that any information relating to competitive interest, the disclosure of which would impair the competitive business of the provider, is considered proprietary confidential business information. The information contained in Southern Bell's response to Item Nos. 427(a) and 427(b), as more specifically described above, meets the statutory criteria and should therefore be afforded confidential classification.

7. 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 4th day of June, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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

R. Douglas Lackey
R. DOUGLAS LACKEY
SIDNEY J. WHITE, JR.
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 529-3862
(404) 529-5094

ATTACHMENT "A"
FPSC DOCKET 920260-TL
STAFF'S 16TH SET OF INTERROGATORIES
DISKETTES RESPONSIVE TO ITEMS 427(A) AND 427(B)
REQUEST FOR CONFIDENTIAL CLASSIFICATION

The data contained on the accompanying diskettes contains confidential business information regarding statistical distributions of Southern Bell's intraLATA toll revenues by mileage band and time of day. This information discloses usage patterns and demand levels for certain classes of Southern Bell customers and shows the corresponding mileage for intraLATA calls made by these customers. Competitors in the intraLATA toll market could use this information to selectively target their marketing strategies and pricing to appeal to key customers, thereby impairing Southern Bell's ability to compete in the intraLATA toll market. As such, this information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes.

INDEX OF PROPRIETARY INFORMATION

<u>Filename(s)</u>	<u>Title</u>	<u>Location of proprietary material</u>
427MTS90.WK3	MTS Annual Revenue by Mileage Band and Time of Day (1990)	The numbers on all lines, all columns, with the exception of the Grand Total.
427MTS91.WK3	MTS Annual Revenue by Mileage Band and Time of Day (1991)	The numbers on all lines, all columns, with the exception of the Grand Total.
427MTS92.WK3	MTS Annual Revenue by Mileage Band and Time of Day (1992)	The numbers on all lines, all columns, with the exception of the Grand Total.
427WAT90.WK3	WATS/800 Priceout (1990)	All numbers appearing on all lines and columns except Total Messages, Total Minutes, and Total Revenues for WATS and 800 Service.
427WAT91.WK3	WATS/800 Priceout (1991)	All numbers appearing on all lines and columns except Total Messages, Total Minutes, and Total Revenues for WATS and 800 Service.

ATTACHMENT "A"
FPSC DOCKET 920260-TL
STAFF'S 16TH SET OF INTERROGATORIES
DISKETTES RESPONSIVE TO ITEMS 427(A) AND 427(B)
REQUEST FOR CONFIDENTIAL CLASSIFICATION
(CONTINUED)

<u>Filename(s)</u>	<u>Title</u>	<u>Location of proprietary material</u>
427WAT92.WK3	WATS/800 Priceout (1992)	All numbers appearing on all lines and columns except Total Messages, Total Minutes, and Total Revenues for WATS and 800 Service.
427SVSVC.WK3	1990-1992 Saver Service® Priceout	All numbers appearing on all lines and columns

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.

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 4th day of June, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Tracy Hatch
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
315 South Calhoun Street
Suite 716
Tallahassee, Florida 32301
atty for FIXCA

Joseph Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, Florida 32854-1038

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia and Cox

Laura L. Wilson, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

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.
306 North Monroe Street
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.
106 East College Avenue
Suite 1410
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
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
Suite 202
8130 Baymeadows Circle, West
Jacksonville, FL 32256

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

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

Michael B. Twomey
Assistant Attorney General
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

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

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

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

Harold McLean
Assistant Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Nancy B. White
(07)