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June 7, 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. 921193-TL - Palm Beach County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Traffic Study in response to Order No. PSC-93-0029-PCO-TL and Request for Specified Confidential Classification, which we ask that you file in the 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 to the parties shown on the attached Certificate of Service.

Sincerely yours,

*J. Phillip Carver*  
J. Phillip Carver (2)

Enclosures

cc: All Parties of Record  
A. M. Lombardo  
Harris R. Anthony  
R. Douglas Lackey

RECEIVED & FILED  
*Jan*

A BELLSOUTH Company

DOCUMENT NUMBER-DATE

06102 JUN-7 93

11:00-RECORDS/REGISTRATION

**CERTIFICATE OF SERVICE**  
**Docket No. 921193-TL**

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 7<sup>th</sup> day of June, 1993  
to:

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

Alan N. Berg  
Senior Attorney  
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Post Office Box 5000  
Altamonte Spgs, FL 32715-5000

Michael W. Tye  
AT&T Communications of the  
Southern States, Inc.  
106 East College Avenue  
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Tallahassee, Florida 32301

J. Phillip Carter  
(2)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request by Palm Beach ) Docket No. 921193-TL  
County Board of County )  
Commissioners for Extended Area ) Filed: June 7, 1993  
Service Between all Exchanges )  
in Palm Beach County )  
\_\_\_\_\_ )

**SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S  
REQUEST FOR SPECIFIED 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 Specified Confidential Classification for certain information included in Southern Bell's Traffic Studies filed in the above-referenced docket.

1. On January 6, 1993, the Florida Public Service Commission ("Commission") issued Order No. PSC-93-0029-PCO-TL, which required Southern Bell to file traffic studies. By Order No. PSC-93-0764-PCO-TL, issued May 20, 1993, the time for filing these studies was extended until June 5, 1993.<sup>1</sup> In response to the Commission's Order, Southern Bell is filing traffic studies on routes that contain traffic information which is proprietary

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<sup>1</sup> Since June 5, 1993 fell on a Saturday, the due date is the next business day thereafter, June 7, 1993. See, Rule 1.090, Florida Rules of Civil Procedure.

DOCUMENT NUMBER-DATE

06102 JUN-78

FILED RECORDS AND REPORTS

EX

confidential business information. This information is comprised of Southern Bell's intraLATA traffic data regarding routes in Palm Beach County. With the advent of intraLATA competition on January 1, 1992, these routes are subject to toll competition and are thus qualified for confidential treatment.

2. In accord with Rule 25-22.006, Florida Administrative Code, the information that Southern Bell considers proprietary has been highlighted for identification purposes and appended hereto as Exhibit "A". Southern Bell has also appended hereto as Exhibit "B" two edited copies of the traffic studies with this confidential information removed. Finally, Southern Bell has appended as Exhibit "C" a listing of the page and line at which this confidential information appears.

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is entitled to confidential treatment by demonstrating how the information qualifies under one of the statutory examples designated therein. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement to indicate how Southern Bell or its ratepayers or its business operations will be harmed by public disclosure.

4. The traffic data for the routes at issue in this proceeding essentially provide a blueprint of the toll usage over

these various routes. This information is maintained by Southern Bell on a proprietary and confidential basis in order that Southern Bell may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

5. Although the traffic information is clearly necessary for a full examination of the merits of the extended area service request in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. With the advent of intraLATA toll competition effective January 1, 1992, this information could now subject Southern Bell to competitive harm if it were made public. The disclosure of such traffic patterns to the public would make available to Southern Bell's competitors highly valuable competitive information that such competitors could use to target the most lucrative routes.

6. The information for which confidential treatment is requested is intended to be and is treated as confidential by Southern Bell and has not been disclosed to the public.

WHEREFORE, Southern Bell respectfully requests that the Commission enter an order classifying the above-described traffic data as proprietary confidential business information pursuant to

Rule 25-22.006, Florida Administrative Code, that is exempt from public disclosure pursuant to Section 119.07, Florida Statutes.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND  
TELEGRAPH COMPANY

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FPSC DOCKET 921193-TL  
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

The following information is identified by page and line numbers is considered confidential and proprietary:

<u>ATTACHMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
A	1	1-23	1
	2	24-32	1
A-1	1	1-21	1
	2	22-32	1
A-2	1	1-16	1
B	1	1-28	1
	2	1-28	1
	3	1-28	1
	4	1-28	1
	5	1-28	1
	6	1-28	1
	7	1-28	1
	8	1-28	1
	9	1-28	1
	10	1-28	1
	11	1-28	1
	12	1-28	1
	13	1-28	1
14	1-28	1	
15	1-28	1	
16	1-28	1	
17	1-28	1	
18	1-28	1	
19	1-28	1	
20	1-28	1	

EXHIBIT C  
PAGE 2 OF 5

<u>ATTACHMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
B	21	1-28	1
	22	1-28	1
	23	1-28	1
	24	1-28	1
	25	1-28	1
	26	1-28	1
	27	1-28	1
	28	1-28	1
	29	1-28	1
	30	1-28	1
	31	1-28	1
	32	1-28	1
	D	1-A	1-14
1-B		15-29	1
1-C		30-32	1
D	2	1-25	1
	3	1-25	1
	4	1-25	1
	5	1-25	1
	6	1-25	1
	7	1-25	1
	8	1-25	1
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	24	1-25	1
	25	1-25	1
	26	1-25	1
	27	1-25	1
	28	1-25	1
	29	1-25	1
	30	1-25	1



EXHIBIT C  
PAGE 3 OF 5

<u>ATTACHMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
D	31	1-25	1
	32	1-25	1
	33	1-25	1
	34	1-25	1
	35	1-25	1
	36	1-25	1
	37	1-25	1
	38	1-25	1
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	64	1-25	1
	65	1-25	1
	66	1-25	1
	67	1-25	1
	68	1-25	1
	69	1-25	1

EXHIBIT C  
PAGE 4 OF 4

<u>ATTACHMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
D	70	1-25	1
	71	1-25	1
	72	1-25	1
	73	1-25	1
	74	1-25	1
	75	1-25	1
	76	1-25	1
	77	1-25	1
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	107	1-25	1
	108	1-25	1
	109	1-25	1
	110	1-25	1
	111	1-25	1
	112	1-25	1
	113	1-25	1
	114	1-25	1
	115	1-25	1

<u>ATTACHMENT</u>	<u>PAGE NO.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
D	116	1-25	1
	117	1-25	1
	118	1-25	1
	119	1-25	1
	120	1-25	1
	121	1-25	1
	122	1-25	1
	123	1-25	1
	124	1-25	1
	125	1-25	1
	126	1-25	1
	127	1-25	1
	128	1-25	1
129	1-25	1	
E	1	1-32	1
E1	1	1-23	1
	2	24-32	1
F-1	1	1-24	1
	2	25-32	1
H	1	1-3	1

REASON 1: These traffic data relate to toll usage over the various routes at issue. This is proprietary information maintained by Southern Bell on a confidential basis to plan its network deployment based on traffic demand over the respective toll routes. The disclosure of this information would allow Southern Bell's competitors in the intraLATA toll market to target the most lucrative routes and would thereby competitively harm Southern Bell.