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July 8, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket Nos. 920260-TL, 900960-TL, 910163-TL, 910727-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Motions for Reconsideration of Order Nos. PSC-93-0964-CFO-TL and PSC-93-0965-CFO-TL. Please file these documents in the above-captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the originals were filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

ACK

AFA

APP

CAF

CMU
Enclosures

CTR

cc: All Parties of Record

EAG A. M. Lombardo

LEB 1W/m H. R. Anthony

LIN 6 R. D. Lackey

CPC

RCH

SEC

WAS

UTH

3 filings

Sincerely,

Sidney J. White, Jr.
Sidney J. White, Jr. (P.S.)

DOCUMENT NUMBER-DATE

07330 JUL-88

FLORIDA 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 8th day of July 1993 to:

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Sidney J. White, Jr.

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: July 8, 1993

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
MOTION FOR RECONSIDERATION OF ORDER NO. PSC-93-0964-CFO-TL

COMES NOW, BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and files, pursuant to Rule 25-22.038(2), Florida Administrative Code, its Motion for Reconsideration of Order No. PSC-93-0964-CFO-TL, issued on June 28, 1993 by the Prehearing Officer in the above-referenced dockets.

1. On April 9, 1993, Southern Bell filed a Request for Confidential Classification ("Request") for certain information contained in the Company's response to Item No. 372 of Staff's Fourteenth Set of Interrogatories. This information contains

customer-specific billing information and service-specific historical and projected revenues.

2. On June 28, 1993, the Prehearing Officer issued Order No. PSC-93-0964-CFO-TL granting in part and denying in part the Company's Request.

3. In her discussion of the reasons for denying Southern Bell's Request for Confidentiality, the Prehearing Officer overlooked certain factual information or failed to consider important reasons why the subject information should be kept confidential.

4. The Order acknowledges that the type of information described by Southern Bell as being included in the pertinent portions of its response to Interrogatory Item No. 372 is entitled to confidential classification. Order, at page 2. However, the Order incorrectly concludes that the information is not of "sufficient specificity to warrant confidential classification." Id. The reason cited in the Order for the purported "insufficiency" is that the information is either "aggregated on a LATA basis" or that it is "general information." This conclusion is inaccurate and should be reconsidered.

5. This first error relates to page number F01B14Y000019. The Order states that the information at issue is not entitled to confidential classification because it is "aggregated." However, in reality, this information reveals specific Southern Bell customers' usage of specific Company services. The customers are identified by name. The actual revenues derived through Company

billing of these identified customers is also depicted on this page. Clearly, the Prehearing Officer either overlooked or failed to consider the actual data contained on this page, as readily apparent from a review of the document. The Commission has steadfastly protected such customer-specific information in the past in recognition of Southern Bell's customers' legitimate privacy interests in such information. Consequently, the Order should be reconsidered to cure this apparent oversight.

6. The next factual errors contained in the Order relate to pages F01B14Y000402, F01B14Y000403, F01B14Y000417 and F01B14Y000418. The Order states that the information contained on these pages is either "aggregated on [a] LATA basis" or that it is "general information." Southern Bell's Request for Confidentiality states that this information relates to revenues derived from Company services, the disclosure of which would impair the competitive business of Southern Bell. Request, at page 2. A review of these pages clearly shows that what is depicted are historical and projected revenue data relating to a myriad of Southern Bell's services including, but not limited to, ESSX® service, Inside Wire Service, Custom Calling Services, Prestige Service, Message Toll Service (MTS), WATs services, Operator Services, various non-regulated enhanced services, and numerous private line services. The documents disclose revenue growth trends for these individual services and not "aggregated" revenues as indicated in the Order. Further, this information would be valuable to Southern Bell's competitors in making market

entry decisions relative to perceived growth patterns or revenue erosion scenarios. This information could also be used to identify the services in which Southern Bell projects rapid growth. If this information were publicly disclosed, competitors would unfairly gain this information without the need to conduct their own market studies or projections. Armed with such knowledge, alternative service providers in competition with Southern bell could accelerate marketing plans or target specific geographic locations, such as that depicted in the pages at issue herein. The Prehearing Officer apparently overlooked or failed to consider that the actual information on these pages is service specific, contains projected revenues for such services and relates to competitive services. Southern Bell stated these facts in its original Request for Confidentiality. The Order does not address these issues at all. Consequently, the Order should be reconsidered to cure this apparent oversight.

Based on the foregoing, Southern Bell moves the Prehearing Officer to reconsider those portions of Order No. PSC-93-0964-CFO-TL pertaining to the customer-specific information and service specific information discussed above and to find that such information is entitled to confidential classification.

Respectfully submitted this 8th day of July, 1993.

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