

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Private Line and)
Special Access Expanded)
Interconnection)

Docket No. ██████████
Filed: September 9, 1993

NOTICE OF FILING RESPONSE TO INTERROGATORIES
AND
MOTION FOR PROTECTIVE ORDER AND REQUEST
FOR CONFIDENTIAL CLASSIFICATION

Quincy Telephone Company hereby gives notice of the filing of its responses to Interrogatory Nos. 6, 37, 38, 40-45 of Staff's First Set of Interrogatories and Nos. 56 and 57 of Staff's Third Set of Interrogatories, in the above docket.

For the reasons set forth below, an answer to No. 6 is not being provided to parties of record. Only this notice of filing and motion are being provided in accordance with the certificate of service. However, answers to the other interrogatories are being provided.

Quincy Telephone Company pursuant to Rule 25-22.006(5), F.A.C., moves for a protective order for material filed in response to Interrogatory 6, Staff's First Set of Interrogatories, and in support of said motion, states that the material is entitled to protection and should be granted confidential classification and exemption from the operation of Section 119.07(1), F.S., for the following reasons:

- 1) Interrogatory 6 seeks information, and Quincy Telephone Company is providing information on the specific percentage of private line and special access revenue for particular customers.
- 2) Special access and private line service is already a competitive service and may be even more competitive as the direct result of this docket.
- 3) The information being provided by Quincy Telephone Company is "proprietary confidential business information," within the meaning of that term as used in Section 364.183(3)(e), F.S.
- 4) Other LECs have also sought confidential classification for the similar information they are providing in this docket.
- 5) Special access and private line traffic information is intended to be and will henceforth be treated by Quincy Telephone Company as private.

DOCUMENT NUMBER-DATE

09746 SEP-93

FPSC-RECORDS/REPORTING

Appended hereto, in an envelope marked CONFIDENTIAL, is Attachment A, which sets forth the information sought by Interrogatory 6. Edited copies with the confidential information deleted are being provided to the parties as Attachment B.

Respectfully submitted this 9th day of September, 1993.



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Attorneys for
Quincy Telephone Company
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Quincy, Florida 32351

CERTIFICATE OF SERVICE
Docket No. 921074-TP

I HEREBY CERTIFY that a true copy of the foregoing Notice of Filing Response to Interrogatories 6, 37, 38, 40-45, 56 and 57 and Motion for Protective Order and Request for Confidential Classification regarding No. 6 on behalf of Quincy Telephone Company has been furnished by U.S. Mail or by hand delivery this 9th day of September, 1993 to the following:

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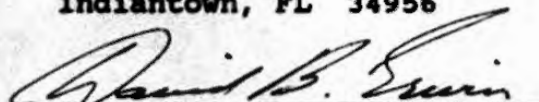
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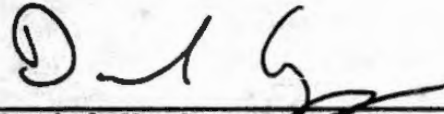
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VERIFICATION

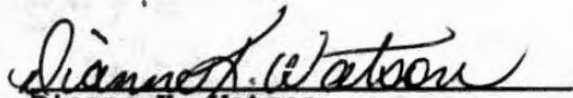
I, Daniel V. Gregory, having been duly sworn, hereby state that Responses to Items 6, 37, 38 and 40 - 45 of Staff's First Set of Interrogatories and Items 56 and 57 of Staff's Third Set of Interrogatories in Docket No. 921074-TP have been answered by me, or the answers have been prepared under my supervision, and the answers are true and correct to the best of my knowledge and belief.



Daniel V. Gregory
Vice President & General Manager
QUINCY TELEPHONE COMPANY

State of FLORIDA
County of GADSDEN

Subscribed and sworn to before me, this 9th day of September,
1993.



Dianne K. Watson
Notary Public

Notary Public, State of Florida
My Commission Expires Sept. 3, 1995
Bonded Thru Troy Fain - Insurance Inc.

M E M O R A N D U M

September 10, 1993

TO: DIVISION OF APPEALS
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS
 DIVISION OF COMMUNICATIONS
 DIVISION OF ELECTRIC AND GAS
 DIVISION OF RESEARCH
 DIVISION OF WATER AND SEWER
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (FLYNN)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO.: 09747-93

DESCRIPTION: Responses to Interrogatory Nos. 6, 37,

40-45 of Staff's 1st Set and Nos. 56 and 57 of Staff's

3rd Set

SOURCE: Quincy Telephone Company

DOCKET NO.: 921974-TP

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.