

NANCY B. WHITE
General Attorney

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

ORIGINAL
FILE COPY

September 24, 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

- ACK
- AFA _____
- AFP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____

Enclosures

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

RECEIVED & FILED

[Signature]

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10331 SEP 27 83

FPSC-RECORDS/REPORTING

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: September 24, 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 information provided in response to Item No. 223 in Staff's Twenty-Second Request for Production of Documents dated July 20, 1993.

1. Southern Bell is filing its Request for Confidential Classification for its Response to Document Request Item No. 223 because it deems the information requested as confidential and proprietary business information in that it pertains to details of Southern Bell's re-engineering efforts. Because of the impact of this information on the Company's employee body, disclosure of this information could cause harm to the Company's business operations.

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

10331 SEP 27 8

FPSC-RECORDS/REPORTING

L. J. ...
FILE COPY

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 Document Request Item No. 223, this response is entitled to proprietary confidential classification for compelling reasons. There can be no dispute that disclosure of this data would harm the Company's business operations. The data contains the results of the Company's re-engineering efforts which will result in the reduction of employee positions. While there has been public release of estimates of the total workforce reduction, details have been limited to very few senior managers. The information furnished to Staff contains an exact count, by specific department and by specific timeframe, of the personnel to be reduced from present to the end of 1994.

6. Premature release of this information will have a severe impact on the Company. Lost productivity and lowered morale will result, thereby harming the Company's business operations. Further, knowledge of the specific timeframe in which reductions will be made could give a competitive advantage to the Company's competitors in that it would signal to them the

timeframe in which the Company's cost of operations would be reduced. In addition, the Company's re-engineering efforts are still in an evolutionary process. Specific departmental force reductions may be faster or slower than planned. Release of this information on a premature basis will result in lowered efficiency, thereby harming the Company's operations the ratepayers.

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 24th day of September, 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

NANCY B. WHITE

4300 Southern Bell Center

675 West Peachtree St., N.E.

Atlanta, Georgia 30375

(404) 529-5387

ATTACHMENT "A"

**FPSC DOCKET 920260-TL
FPSC STAFF'S 22ND REQUEST FOR DOCUMENTS
ITEM 223**

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. The documents furnished the Staff in response to this request contain the results of the Company's re-engineering efforts which will result in the reduction of many employee positions as the work is reduced or consolidated. The Company has released estimates of the total figures, but, has limited the distribution of the detailed headcount projections to a very few key planners and senior managers. Premature release of the anticipated losses by department will have severe morale impacts. The Company continues to protect this information as Proprietary Confidential Business Information because the re-engineering project is an evolutionary process which will invariably move faster and slower than projected depending on the departments. No prudent manager would release this kind of information until certain where and when cuts were about to be made. Unplanned and premature release of this information will cost the Company through lost productivity and lowered morale. Therefore, this information is considered proprietary and confidential business information by Southern Bell and is protected from disclosure by the statutes.

LOCATION OF THE PROPRIETARY INFORMATION

The proprietary information is identified by page and line numbers as follows:

Page Number	Line Number
F01B22Z	
0000340-341	Numbers in columns and totals by department
0000348	Numbers in columns for years 93 and 94 and totals by department
0000351-370	Employee reduction numbers in columns for years 93 and 94 and totals by department

ATTACHMENT "B"

Two 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 24th day of September, 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, FL 32301-1838
atty for FIXCA

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

Kenneth A. Hoffman
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

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
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

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Michael B. Twomey
Gerald B. Curington
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 Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Nancy B. White