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ORIGINAL
FILE COPY

December 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. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White ^{1AB}
Nancy B. White

Enclosures

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

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13019 DEC-7 93

PRINTING

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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

Filed: December 7, 1993



SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER

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 and Motion for Permanent Protective Order regarding portion of Exhibit DED-2 attached to the testimony of David E. Dismukes, witness for the Staff of the Florida Public Service Commission filed on November 22, 1993.

1. Southern Bell is filing its Request for Confidential Classification for Exhibit DED-2, Schedule 5, because it deems the information requested to be confidential and proprietary business information in that it reflects traffic patterns of intraLATA toll services. Since competitors who offer intraLATA toll services can use this information as a resource, disclosure of this information would impair 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 Exhibit of the information designated by Southern Bell as confidential.

DOCUMENT NUMBER-DATE

13019 DEC-7 83

FPSC-RECORDS/REPORTING

3. Appended hereto in an envelope designated as Attachment B is one copy of the Exhibit with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the Exhibit with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding Exhibit DED-2, Schedule 5, this exhibit is entitled to proprietary confidential classification. The data provide a blueprint of Southern Bell's route-specific Community of Interest factors which relate directly to the intraLATA toll usage along those routes. It reflects actual and perceived traffic demand over specific toll routes. The disclosure of this highly valuable competitive toll market information would impair Southern Bell's ability to compete in the intraLATA toll market. Competitors could use the information to target the most lucrative routes. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider. The information contained in Exhibit DED-2, Exhibit 5, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. 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 confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 7th day of December, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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ATTACHMENT "A"
FPSC DOCKET 920260-TL
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION
TESTIMONY OF DAVID E. DISMUKES
EXHIBIT DED-2, SCHEDULE 5

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. This information reflects route specific Community of Interest Factors which relate directly to IntraLATA toll usage along those routes, and disclosure of which would impair the competitive business operations of Southern bell. The Florida Public Service Commission has opened the LATA to competition. This information could be used by competitors to harm Southern Bell in its marketing of its products and services. This same information is held to be Confidential by Southern Bell's competitors. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF PROPRIETARY MATERIAL

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

<u>PAGE</u>	<u>LINE/COLUMN NO.</u>
1	1-36/Community of Interest Factors
2	37-58/Community of Interest Factors

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 7th day of December, 1993 to:

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