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January 6, 1994

Mr. Steven C. Tribble
Director, Division of Records and Reporting
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 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,

Sidney J. White, Jr. (es)
Sidney J. White, Jr.

Enclosures

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

RECEIVED & FILED

[Signature]
BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
00230 JAN-6 84
FPSC-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 6th day of January, 1994 to:

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Sickey J. White, Jr.

(07)

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
)		
In re: Show cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers)	Docket No. 900960-TL
)		
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
)		
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: January 6, 1994

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", "BST" or "Company"), pursuant to Rule 25-22.006(3)(a) and (4), Florida Administrative Code, and files its Request for Confidential Classification for certain information contained in Staff's Work Activity Statistical Sampling Process (WASSP) Audit Workpapers.

1. During 1993, Staff conducted audit field work relating to its WASSP Audit in these consolidated dockets. Staff has now completed its field work relating to these efforts.

DOCUMENT NUMBER-DATE

00230 JAN-6 1994

FPSC-RECORDS/REPORTING

2. On December 16, 1993 a field audit exit conference was held by telephone conference with representatives of both Staff and Southern Bell present. During the field audit exit conference, Staff identified certain documents and information that it desires to include in its audit workpapers to support its audit in this docket. Also, during the exit conference, Staff submitted a copy of its Audit Report to Southern Bell in order to afford the Company the opportunity to review the report to determine if it included any proprietary confidential business information.

3. Pursuant to Rule 25-22-006(3)(a) and (4), Florida Administrative Code, Southern Bell is hereby filing its Request for Confidential Classification for certain portions of Staff's WASSP Audit workpapers. These documents contain internally developed and commercially valuable business information, employee-specific information unrelated to compensation, duties, qualifications or responsibilities, and Southern Bell's customers' names, addresses, telephone numbers and details of service provided by Southern Bell to its customers.

4. Pursuant to Rule 25-22.006(4)(c), Southern Bell has included three attachments with this filing:

5. Attachment A is a listing showing the location in the subject documents of the information designated by Southern Bell as confidential.

6. Attachment B contains two edited copies of the subject documents with the confidential information deleted. Copies of

Attachment B are not being served on the other parties in this proceeding.

7. Attachment C is a sealed package containing copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

WASSP AUDIT REPORT

8. No proprietary confidential business information is contained in the WASSP Audit Report.

WASSP AUDIT WORKPAPERS

A. Employee Personnel Information Unrelated to Compensation, Duties, Qualifications or Responsibilities

9. With respect to the portions of the workpapers documents referenced in Attachment A as containing employee-personnel information unrelated to compensation, duties, qualifications, or responsibilities, such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information. This information includes Company employees' social security numbers. The Commission has consistently classified such personal employee information as confidential information, and has recognized the legitimate privacy interests possessed by such employees as it relates to such information.

B. Customer Specific Information

10. With respect to the portions of the audit workpapers referenced in Attachment A as containing Southern Bell's

customers' names, addresses, telephone numbers and other service details of a customer specific nature, this information is entitled to confidential classification pursuant to Section 119.07(3)(w), Florida Statutes (customer name, address and telephone number) and prior Commission orders protecting customer-specific information from public disclosure. (See Order No. PSC-93-1044-CFO-TL, issued July 19, 1993 in these consolidated dockets, wherein the Commission granted Southern Bell's request for confidentiality for customers' names and addresses). The only other customer specific information sought to be protected relates to Southern Bell's business records containing the category and types of services subscribed to by the named customers. This information is considered customer proprietary network information (CPNI) by both the Florida Commission and the FCC. The Commission has consistently held that customer-specific information should be kept confidential and thus not subject to the public inspection and examination provisions of Section 119.07(1), Florida Statutes.

C. Commercially Valuable Information

11. One document contained in the audit workpapers is commercially valuable and could be sold by BST pursuant to license agreements with outside parties. This document is the "Work Activity Statistical Sampling Process (WASSP) Time Reporting Procedures for Technicians." Thus, this document is entitled to confidential classification pursuant to Section 364.183(3) and (3)(e), Florida Statutes. The document consists

of details relating to the WASSP sample selection process, field technician responsibilities and procedures, procedures for preparing work logs required by the WASSP, source documentation requirements, and other valuable information describing the process in detail. BST has been made aware that interest by others exists for this document. While the document has not yet been sold to anyone, BST has had discussions with independent telephone companies expressing interest in purchasing the package. The commercial value of this document will remain intact only so long as it is not publicly disclosed.

12. Any license fees obtained by BST from its work product will benefit the Company through additional, non-service revenues. Public release of this particular BST document would destroy its value as a marketable product and directly harm BST. The Company currently has the ability to benefit from any future outside license fee revenues obtained through arrangements involving this proprietary work product. The value of the document is evident in other parties' willingness to pay for the information. Public disclosure would destroy this commercial value, and would result in financial harm to BST since any firm could thereafter simply go to the Florida Commission and obtain a free copy. This anomalous and inequitable result can be avoided by the Commission by classifying this document in its entirety as confidential. Southern Bell also requests a waiver of the line-by-line identification requirements of Rule 25-22.006, Florida Administrative Code, in this particular case since the entire

document has commercial value and it represents the blueprint for the procedural aspects of the WASSP process.

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 6th day of January, 1994.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

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FPSC DOCKETS 920260 ET AL
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION
FOR INFORMATION CONTAINED IN
STAFF'S WASSP AUDIT WORKPAPERS

JUSTIFICATION FOR PROPRIETARY INFORMATION

A. Employee Personnel Information Unrelated to Compensation, Duties, Qualifications or Responsibilities - With respect to the portions of the audit report and workpaper documents containing employee-personnel information unrelated to compensation, duties, qualifications, or responsibilities, such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information. This information includes Company employees' social security numbers.

B. Customer Specific Information - With respect to the portions of the audit workpapers referenced in Attachment A as containing Southern Bell's customers' names, addresses, telephone numbers and other service details of a customer specific nature, this information is entitled to confidential classification pursuant to Section 119.07(3)(w), Florida Statutes (customer name, address and telephone number) and prior Commission Orders protecting customer-specific information from public disclosure. (See Order No. PSC-93-1044-CFO-TL, issued July 19, 1993, in these consolidated dockets, wherein the Commission granted Southern Bell's request for confidentiality for customers' names and addresses.) The only other customer specific information sought to be protected relates to Southern Bell's business records containing the category and types of services subscribed to by the named customers. This information is considered customer proprietary network information (CPNI) under both Florida and FCC CPNI related policies.

C. Commercially Valuable Information - One document contained in the audit workpapers is commercially valuable and could be sold by BST pursuant to license agreements with outside parties. This document is the "Work Activity Statistical Sampling Process (WASSP) Time Reporting Procedures for Technicians." Thus, this document is entitled to confidential classification pursuant to Section 364.183(3) and (3)(e), Florida Statutes. The document consists of details relating to the WASSP sample selection process, field technician responsibilities and procedures, procedures for preparing work logs required by the WASSP, source documentation requirements, and other valuable information describing the process in general. BST has been made aware that interest by others exists for this document. While the document has not yet been sold to anyone, the commercial value of the document remains intact so long as it is not publicly disclosed.

LOCATION OF THE PROPRIETARY INFORMATION

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

<u>Page No.</u>	<u>Line Numbers</u>	<u>Reason Proprietary</u>
178	3, 18	A
179	2, 16	A
180	2, 21	A
181	2, 13	A
182	2	A
183	2, 17	A
184	2, 11	A
185	2, 19	A
186	2, 16	A
187	2, 18	A
188	2, 4	A
189	2, 24	A
190	2	A
191	3, 22	A
192	2, 19	A
193	2, 21	A
195	2 - 6	A
217 - 234	ALL	C
241	2, 21	A
243	6	A
247	7	A
	Columns A - E	B
251	2, 3, 6	B
252	5 - 7	B
253	3 - 6, 8, 9, 11 - 15, 17, 18	B
254	3, 4, 7 - 9, 11, 13 - 16	B
256	7	A
	Columns A - E	B
260	2, 3, 6	B
261	7 - 10, 15, 17	B
264	2, 19	A

266	7	A
270	7	A
	Columns A - H	B
273	2 - 3	B
276	4, 6 - 9, 17, 20 - 23, 27 - 31	B
277	3 - 5, 13 - 16, 26, 28 - 30	B
278	7, 9 - 14, 19, 23 - 25, 37 - 41	B
279	5, 7 - 9	B
293	3, 19	A
294	2, 16	A
295	2, 21	A
296	2, 13	A
297	2	A
298	2, 17	A
299	2, 11	A
300	2, 19	A
301	2, 16	A
302	2, 18	A
303	2, 4	A
304	2, 24	A
305	2	A
306	3, 22	A
307	2, 19	A
308	2, 20	A
310	2 - 6	A