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April 11, 1994

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

RE: Docket No. ~~921074~~-TP

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's First Request for Confidential Classification to be filed in the above mentioned docket for the Commission's consideration.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Thank you for your assistance in this matter.

Very truly yours,

Mary Jo Peed (02)
Mary Jo Peed

Enclosure

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

RECEIVED
28

DOCUMENT NUMBER-DATE

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CERTIFICATE OF SERVICE
Docket No. 921074-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 11 day of April, 1994,
to:

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BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) APRIL 11, 1994

BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to Rule 25-22.006, Florida Administrative Code and files its first request for confidential classification of information contained in response to Request No. 1 of the Florida Public Service Commission Staff's ("Staff") First Set of Interrogatories and for information contained in various documents produced in response to Request Nos. 5 and 10 of Staff's First Request for Production of Documents.

1. On February 14, 1994, the Staff filed its First Set of Interrogatories ("Interrogatories") and Request for Production of Documents on Southern Bell ("PODs").

2. On March 21, 1994, Southern Bell filed its Objections and Responses to Staff's PODs, its notice to the Commission's Director of Records and Reporting of serving responses to Staff's Interrogatories and its First Notice of Intent to Request Confidential Classification ("Notice"). The Notice was required because some of the documents as well as Southern Bell's response to Request No. 1 of Staff's Interrogatories contain information

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which is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes.

3. Pursuant to Rule 25-22.006(3)(a), Southern Bell is, within the 21 days allowed by the Rule, filing its request for confidential classification of the information it contends is proprietary confidential business information.

4. Pursuant to Rule 25-22.006, Florida Administrative Code, Southern Bell is affixing as Attachment "A" a listing identifying the page and line number at which the confidential material found. Southern Bell has affixed as Attachment "B" two copies of the material in which the proprietary confidential business information has been redacted and appended hereto as Attachment "C" is one copy of the material with the proprietary confidential business information highlighted. The material for which confidential classification is sought is intended to be and is treated by Southern Bell as private and has not been disclosed.

5. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirements of public disclosure of §199.07, Florida Statutes. Southern Bell's response to Staff's Interrogatory No. 1 contains information disclosing the material costs for multiplexing channel banks, lightwave terminals and individual circuit plugs purchased by Southern Bell from various suppliers. Disclosure of these material costs would impair the ability of Southern Bell and its

affiliates to contract for such goods and services on favorable terms. Those type of information is specifically classified as confidential business information pursuant to §364.183, Florida Statutes and is exempt from the Open Records Act. The Commission has previously granted requests for confidential classification for similar information. See Order No. PSC-93-1280-CFO-TL at page 6, issued September 2, 1993.

6. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirement of public disclosure in §199.07, Florida Statutes. The information contained in documents produced in response to Request No. 5 (F10B012 0000009 and F10B012 0000010) reflects data from which Southern Bell's usage costs for switched access services can be derived on a distance sensitive and time-of-day sensitive basis. These cost studies were done pursuant to long run incremental costing theories and as such reflect Southern Bell's costs of providing services on a going forward basis. This information relates to the competitive interests of Southern Bell and disclosure would impair the competitive business of Southern Bell. While it is true that competition has not been authorized for the local market in Florida for other than private line services, the Commission has authorized expanded interconnection for alternative access vendors for special access and private line services and is considering in this docket expanded interconnection for alternative access vendors for switched

access services. The data produced in response to Staff's Request No. 5 of Production of Documents is valuable to competitors formulating strategic plans for entry into the switched access market and as a benchmark for their service offerings. Southern Bell has requested confidential classification of the same data in Docket No. 900633-TL on July 27, 1993.

7. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.193, Florida Statutes and is exempt from the requirement of public disclosure in §199.07, Florida Statutes. The information contained in documents produced in response to Request No. 10 (F10B012 0000011, F10B012 0000012, and F10B012 0000013) reflects customer specific minutes-of-use forecasts by call type. These forecasts are based on actual customer specific minute-of-use data derived from Southern Bell's customer records. The data is considered to be a reliable indication of the market structure for a specific customer. As the data is customer specific and derived from Southern Bell's customer records it is exempt from disclosure pursuant to §119.07, Florida Statutes.

8. Disclosure of the information found in Attachment "A" would impair Southern Bell's competitive interests, thwart its ability to contract with outside vendors on favorable terms and conditions. Further, if the information were provided without a confidential classification, Southern Bell would be required to disclose customer specific information derived from its customer

records. Therefore, this information is proprietary confidential business information pursuant to Section 364.183, Florida Statutes and is exempted from the requirement of public disclosure of Section 114.07, Florida Statutes.

WHEREFORE, Southern Bell requests that the Commission grant its request for confidential treatment.

Respectfully submitted this 11th day of April, 1994.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
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**FPSC Docket 921074-TP
FPSC Staff's 1st Set of Interrogatories
& 1st Request for Production of Documents**

Explanation for Confidentiality Request

- A. This information contains actual unit cost information for discrete switched access rate elements. This cost data would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies. Disclosure of this data could cause potential competitive harm to Southern Bell. As such, this information is specifically classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- B. This information contains material cost information for the multiplexing channel bank, lightwave terminals, and individual circuit plugs purchased by Southern Bell from various suppliers. Because this information can be linked to vendor specific costs, the disclosure of such information could impair the efforts of the company or its affiliates to contract for goods or services on favorable terms. As such, this information is specifically classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- C. This information contains customer specific Minutes-of-Use (MOU) forecasts detailed by call type. Because this forecast is based on actual MOU data in the possession of Southern Bell, it may be considered to be a reliable indication of the market structure for a specific customer.

FPSC Docket 921074-TP
FPSC Staff's 1st Set of Interrogatories
& 1st Request for Production of Documents

Location of Proprietary Material

<u>Item/ Page</u>	<u>Line/Column</u>	<u>Reason</u>
POD Item 5, F10B012 0000009	Lines 10-37, Cols A-G	A
POD Item 5, F10B012 0000010	Lines 10-37, Cols A-G	A
POD Item 10, F10B012 0000011	Lines 5-31, Column A	C
POD Item 10, F10B012 0000012	Lines 5-41, Column A	C
POD Item 10, F10B012 0000013	Lines 8-9, Columns A & B	C
Interrogatory Item No. 1, Page 2 of 2	Lines 14 & 18 Columns A-D	B