#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection Phase II) and Local Transport Restructure

Docket No. 921074-TP Docket No. 930955-TL Docket No. 940014-TL Docket No. 940020-TL Docket No. 931196-TL Docket No. 940190-TL

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Filed: April 15, 1994

# GTE FLORIDA INCORPORATED'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTEFL) seeks confidential classification and a protective order for certain material produced in response to the Commission Staff's Pirst Request for Production of Documents in this proceeding. While a ruling on this Request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes section 119.07(1), and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

Highlighted, unredacted copies of the confidential material are attached to only the original of this Request as Exhibit A. Redacted copies of these items are attached to this Request as Exhibit B.

All of the information for which GTEFL seeks confidential treatment falls within Florida Statutes section 364.183(3)(e), which defines the term "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information."

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The confidential information covered in this filing contains GTEPL's calculations of specific interexchange carriers' (IXCs') present and projected use of local transport rate elements and the associated costs for this usage. This kind of carrier-specific information can be used by an IXC's competitors to discern that IXC's cost structure.

In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the ratepayer.

In the following, line-by-line justification, GTEFL will more specifically describe the competitive value of the confidential data at issue in this Request.

columns D-O. lines 1-37. This chart shows reconfigured demand for the rate elements in GTEFL's new tariff restructuring local transport. Reconfigured demand information appears for AT&T, MCI, Sprint, and the smaller IXCs, respectively, on an annual (columns D, G, J, and M) and monthly (columns F, I, L, and O) basis. The Factor component of the chart (columns E, H, K, and N) is developed using the monthly data and applied to the corresponding "Annual RIC Minutes" number (line 1) to yield the annual reconfigured demand units. Carrier-specific demand for each of the new rate elements (lines 1-37) is shown.

Because the information on the chart is carrier-specific, it can be used by a particular IXC's competitors to derive that IXC's expenses for specific rate elements and for transport in total. Although the other common carrier (OCC) information is aggregated, these customers are very similar in terms of the markets they serve and their demand for various rate elements. Further, because they are relatively small, the impact of disclosure of competitively sensitive information on the OCCs could be disproportionately large.

This cost information, coupled with public information about the IXC's rates, would give a competitor the ability to tailor its pricing to compete most effectively with that carrier. Disclosure of these cost data would thus confer an advantage upon an IXC's competitors. Because this advantage would be gained artificially, rather than through marketplace trial and error, it would distort the marketplace in an anticompetitive manner.

2. GTEFL Response to POD #4. Bates-stamped document 0000004. Columns B-E. lines 1-8. This schedule shows the impact of GTEFL's local transport restructure on each of its major IXC customers, as well as the smaller IXCs. It calculates the total entrance facility, direct trunked, tandem-switched and interconnection revenue as restructured (columns B-E, lines 1-5) and compares that total with the current transport charges paid by the respective carriers (columns B-E, line 6). The schedule then reveals the difference between the new and old structures in terms of both

dollars (column B-E, line 7) and percentages (columns B-E, line 8).

Again, this information is carrier-specific, so it can be used by a competitor to the detriment of the particular IXC to which it pertains. By knowing the amount paid for access under the new structure, a competitor can discern an IXC's cost characteristics. Because the change in expenditures from the old to the new structures is appearent, competitors could know the magnitude of the impact of transport restructure and tailor pricing strategies accordingly.

GTEFL Response to POD #4. Bates-stamped document 0000005. 3. columns C. D. E and G. lines 1-36. This schedule contains detailed information about the impact of the transport restructure upon ATET. It shows the number of existing units taken by ATET for each transport rate element (column C). The existing units are then reconfigured in accordance with the new rate structure (columns D and E). Column E uses a 75% reconfiguration rate, based on the assumption that total reconfiguration of an IXC's units will not occur immediately. The 75% is a realistic figure for about the first year after transport restructuring takes effect. The reconfigured units in column E for each rate element are then multiplied by the new local transport rates to obtain the total revenue impact upon AT&T of the new rates (column G). revenue impacts are given for entrance facilities (column G, line 17), direct trunked transport (column G, line 27), and tandem switched transport (column G, line 35), as well as all three of

these components combined (column G, line 36).

The amount of transport-related charges AT&T now pays, and will pay in the future, to GTEFL is competitively sensitive information because it can be used to discern AT&T's cost structure. This information about AT&T's cost structure would help a competitor to devise effective pricing strategies to better compete with AT&T. This kind of artificial competitive advantage is unfair and ultimately harmful to consumers.

- 4. GTEFL's Response to POD #4. Bates-stamped document 0000006. columns C. D. E. and G. lines 1-36. This schedule shows the revenue impact of GTEFL's restructured transport rates upon MCI. It is arranged exactly as is Bates-stamped document 0000005, discussed above, except that it pertains to MCI, rather than AT&T. GTEFL requests confidential treatment for this document on the same grounds set forth for document 0000005.
- 5. GTEFL's Response to POD #4. Bates-stamped document 0000007. columns C. D. E. and G. lines 1-36. This schedule shows the revenue impact of GTEFL's restructured transport rates upon Sprint. It is arranged exactly as is Bates-stamped document 0000005, discussed above, except that it pertains to Sprint, rather than AT&T. GTEFL requests confidential treatment for this document on the same grounds set forth for document 0000005.

GTEFL's Response to POD #4, Bates-stamped document 0000008. columns C. D. E. and G. lines 1-36. This schedule shows the revenue impact of GTEFL's restructured transport rates upon the OCCs. It is arranged exactly as is Bates-stamped document 0000005, discussed above, except that it pertains to the OCCs, rather than AT&T. GTEPL requests confidential treatment for this document on the same grounds set forth for document 0000005. Although the information is aggregated for these smaller carriers, the demand characteristics are generally similar among these carriers. Information about revenues and distribution of units could thus help a competitor to discern a smaller carrier's cost structure, in an effort to gain an unfair market advantage. Because these carriers are relatively small, public disclosure of any proprietary information could cause them disproportionate harm.

Respectfully submitted on April 15, 1994.

Rv.

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Attorney for

GTE Florida Incorporated

GTE Franks LTR Contr. Businery	8	C	0	E	7	G	H	I	J	1	4	M	N	0
A	Charge		ATT		ATT	Access Ac		MCI Recordiguesal	-			OCC Annual Issantigurad		OCC Recembgured
Rate Element Account NE Monday	-	T.PIE.WILES	V	Faster'	_Umb		factor	Units		- Contract	<u></u>	Under .	Paster .	
3 ENTRANCE FACILITY 4 de VO SAL		667												
5 3m VO 64L	LATC LATC LATC LATC LATC LATC LATC LATC													
7 081 com 84.	-	129 179 301 1,061 260 126												
8 DS3 prot SAL, 1st I/4 sem 8 DS3 prot SAL, 00 add1 I/4 sem	=	1,061												
10 DS1 to VO man 11 DS3 to DS1 man	MIC	126												
12 4 who votes 13 2 who votes	ac ac													
14 CS1 14 SAL 19 DS1 0007 SAL	MC.	9												
16 DB3 prot SAL, 1st 144 pin 17 DB3 prot SAL, 00 mb21 144 pin	enc.													
18 DS1 to VO must 19 DS3 to DS1 must	enc													
19 001 0 001	_													
20 DIRECT TRUNKED TRANSPORT		1 2750												
21 VG term 22 DS1 term	MICHEM	42,431												
23 DG1 tem 24 DG3 tem	MICHE	8,625 42,431 4,680 1,760												
29 CR3 term 20 CR1 to VG muss	MOTERM	234												
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30 TANDEM SMITCHED TRANSPORT: 31 From Incom Smith	BENOM	7,113,007,300												
22 Offices tools facility	HOUSE HOUSE	-												
34 Million base tons 35 Plans basines per editor	HOLITER	340,167,717												
30 Million tandens our adder	wov													
37 Does RIC Minutes	wou .													

<sup>\*</sup> Festive for each center derived by dividing the reconfigured units for each alament by the base RIC estudies for that contex

Attachment 1
Production of Documents No. 3
Page 2 of 3

GTE - FLORIDA - TRANSPORT P • Q INTRASTATE TOTAL	Charging Method	Existing Units*	100% Reconfigured Units	75% Reconfigured Units (a)
Entrance Facility	Wisa	0.000	244	
4 wire voice	MRC	1,243	687	826
2 wire voice	MRC	0	0	
DS1 standard first system	MRC	957	129	336
DS1 standard additional system	MRC	3,504	179	1,010
DS3 protected, 1st 1/4 aim	MRC	74	351	282
DS3 protected, se add1 1/4 alm	MRC	368	1,051	880
DS1 to voice multiplexing	MRC	268	260	263
DS3 to DS1 multiplexing	MRC	38	128	100
4 wire voice	NRC	0	0	
2 wire voice	NRC	0	0	
DS1 standard first system	NRC	0	0	(
DS1 standard additional system	NRC	0	0	
DS3 protected, 1st 1/4 aim	NRC	0	0	
DS3 protected, se add'l 1/4 alm	NRC	0	0	
DS1 to voice muliplexing	NRC	0	. 0	
D63 to DS1 multiplexing	NRC	0	0	
Total Entrance Facility Revenue:	1200			
Direct Trunked Transport				
Voice facility	MRC/ALM	5,206	5,928	5,748
DS1 facility	MRC/ALM	28,726	42,431	39,005
DS1 termination	MRC/TERM	6,302	4,558	4,994
DS3 facility	MRC/ALM	204	1,780	1,386
DS3 termination	MRC/TERM	42	499	385
DS1 to voice mutiplexing	MRC	306	334	328
DS3 to DS1 multiplexing	MRC	35	250	196
DS1 to voice muliplexing	NRC	0	0	
DS3 to DS1 multiplexing	NRC	0	0	
Total Direct Trunked Revenue:		- 2		
Tandem Switched Transport				
Premium facility	MOU/MILE	8,255,453,227	7,113,007,345	7,398,618,816
Nonpremium facility	MOUMILE	0	0	0
Premium termination	<b>MOU/TERM</b>	810,246,716	498,375,434	578,343,255
Nonpremium termination	MOU/TERM	0	0	
Premium tandem switching	MOU	405,123,358	249,187,717	288,171,627
Nonpremium tandem switching	MOU	0	0	0

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#### Personal Departments No. 3

Press 2 of

#### OTE PLORIDA, NC. LOCAL SWITCHING UNIT COMPUTATION AUGUST 1982 - JULY 1982

SERVICE	1002	<b>M2</b>	oct	MOV	CEC	1983 -1881			APB.		48	4	TOTAL
Level Building LE2 - Originating - Day LE2 - Originating - Boo LE2 - Originating - Boo LE2 - Originating - Highl LE2 - Toroninating	39,254,123 22,394,710 14,900,365 63,866,227	46,800,100 22,800,800 12,910,446 64,230,811	41,364,653 21,661,673 14,668,468 61,664,663	30,674,114 22,400,230 14,170,100 61,463,162	30,570,634 83,367,736 13,567,601 66,778,776	40,504,561 34,348,647 16,549,480 64,723,660	41,138,625 22,167,118 14,813,848 62,862,384	49.200,867 27.840,862 17.210,802 76.770,878	44,214,000 34,226,402 14,900,214 66,400,000	41,708,163 23,844,364 16,846,526 60,527,466	44,534,784 23,241,510 14,011,002 64,002,461	42,727,300 21,900,047 14,800,000 68,147,002	801,006,308 279,770,577 168,241,952 782,084,183
TOTAL	141 207 445	120 620 630	120 051 030	124 055 054	140 540 106	146 154 577	141 661 676	100 424 000	148 303 772	141 874 451	140 700 703	137 770 400	1 713 181 085

GTE - FLORIDA - LOCAL TRANSPORT RESTRUCTU A	IRE - IC IMPACTS  B AT&T	C MCI		occ	74 TOTAL
<ul> <li>✓ Annual EOS MOU</li> <li>✓ Proposed RIC Rate</li> <li>✓ Residual Interconnection Charge</li> <li>✓ Total Facility Based</li> <li>✓ Total Restructured</li> </ul>					1,713,181,068 \$0,01318840 \$22,594,117 2,420,524 \$25,014,641
6 Current Transport Structure			,		\$25,012,444
7 \$ Difference					\$2,198
8 % Difference					0.01%

Attachment 1

					Production of D	Attachment ocuments No. 4 Page 2 of
	B	C	100%	75%	A	6
GTE FLORIDA - TRANSPORT AT&T		Existing	Reconfigured	Reconfigured		•
A	Charging Method	Units	Units	Units (a)	LTR Rates (b)	(c = e * b)
Entrance Facalty	Market 1					
4 wire voice	MRC				\$46 69	
2 wire voice	MRC				30 43	
2 wire voice 3 DS1 standard first system 4 DS1 standard additional system 5 DS3 protected, 1st 1/4 aim	MRC				332 75	
✓ DS1 standard additional system	MRC				113 83	
S DS3 protected, 1st 1/4 alm	MRC				1,222 72	
DS3 protected, ea add1 1/4 aim DS1 to voice multiplexing DS3 to DS1 multiplexing	MRC				27 41	
7 DS1 to voice multiplexing	MRC				166 67	
8 DS3 to DS1 multiplexing	MRC				464 26	
9 4 wre voice	NRC				104 91	
/O 2 wire voice	NRC				104 91	
// DS1 standard first system	NRC				788 08	
/A DS1 standard additional system	NRC				113 83	
/3 DS3 protected, 1st 1/4 alm	NRC				788 08	
/Y DS3 protected, ea add1 1/4 alm	NRC				26 27	
AST DS1 to voice multiplexing	NRC				672 54	
/6 DS3 to DS1 multiplexing	NRC				394 04	
17 Total Entrance Facility Revenue:	I				337.01	
Direct Trunked Transport						
18 Voice facility	MRC/ALM				\$6.56	
19 DS1 facility	MRCIALM				13.13	
4° DS1 termination	MRC/TERM				42 03	
DS3 facility	MRCIALM				116.02	
27 DS3 termination	MRC/TERM				350.26	
The state of the s	MRC				166.67	
49 DS1 to voice multiplexing	MRC				464.26	
47 Day to Day margining	NRC				672.54	
DS1 to voice multiplesting						
46 D83 to D81 multiplexing 47 Total Direct Trunked Revenue:	NRC			•	394.04	
Tendem Switched Transport						
	MOLIMILE				\$0,00001920	
Nonpremium facility	MOUMBLE				0.00000000	
Premium termination	MOUTERM				0.00013470	
Nonpremium facility Premium termination Nonpremium termination Premium tendem switching	MOUTERM				0.00006060	
Premium tendem switching	MOU				0.00003290	
Manpremium tendem switching	MOU				0.00041980	
	MOU.				0.00041980	
COMPS expense adjustment Total Tandem Switched Revenue:						

Note: Units based on 1993 data.

Total Facility Based Restructured Revenue:

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Attachment 1

				Δ	E	Production of D	Page 3 of 5
		B	C	100%	75%	A	G
	GTE FLORIDA - TRANSPORT MCI		Existing	Reconfigured	Reconfigured		
	A	Charging Method	Units	Units	Units (a)	LTR Rates (b)	(c = a * b)
	Entrance Facility	2022					
1	4 wire voice	MRC				\$48 69	
9	2 wire voice	MRC				30 43	
マランちゅつものれ いれきとちょ	DS1 standard first system	MRC				332 75	
A	DS1 standard additional system	MRC				113 83	
3	DS3 protected, 1st 1/4 aim	MRC				1,222 72	
6	DS3 protected, ea add1 1/4 alm	MRC				27 41	
R	DS1 to voice multiplexing	MRC				166 67	
0	DS3 to DS1 multiplexing	MRC				464 26	
70	4 were voice	NRC				104 91	
"	2 wee voice	NRC				104 91	
10	DS1 standard first system	NRC				786 08	
/4	DS1 standard additional system	NRC				113 63	
14	DS3 protected, 1st 1/4 aim	NRC				788 08	
15	DS3 protected, ea add1 1/4 alm	NRC				26 27	
16	DS1 to voice multiplexing	NRC				672 54	
17	DS3 to DS1 multiplexing	NRC				394 04	
//	Total Entrance Facility Revenue						
	Direct Trunked Transport						
18	Voice facility	MRCIALM				\$6 56	
19	DS1 facility	MRCIALM				13.13	
42	DS1 termination	MRC/TERM				42.03	
4/	DS3 facility	MRCIALM				116.02	
92	DS3 termination	MRC/TERM				350.26	
43	DS1 to voice mutiplexing	MRC				188.67	
44	- DS3 to DS1 multiplening	MRC				464.26	
45	DS1 to voice muliplexing	NRC				672.54	
26	000 10 001 111-01-0-0	NRC				394.04	
47	Total Direct Trunked Revenue:						
62	Tendem Switched Trensport						
N 0		MOUMNLE				\$0.00001920	
388	Nonpremium facility	MOUMMLE				0.00000000	
99990006 1999	Premium termination	MOUTERM				0.00013470	
3/000	Nonpremium termination	MOUTERM				0.00000000	
37 9	Premium tandem switching	MOU				0.00083280	
33 0		MOU				0.00041980	
34 00	MPB expense adjustment						
35	Total Tandem Switched Revenue:					-	

3 G Total Facility Based Restructured Revenue:

				۵	E	100000000000000000000000000000000000000	Attachment 1 locuments No. 4 Page 4 of 5	
		B	C	100%	75%	7	6	
	GTE FLORIDA - TRANSPORT SPRINT		Existing	Reconfigured	Reconfigured			
	A	Charging Method	Units	Units	Units (a)	LTR Rates (b)	Revenues (c = a * b)	
	Entrance Facility							
つのまっているのの	4 wire voice	MRC				\$48 69		
ar a	2 wire voice	MRC				30 43		
3,	DS1 standard first system	MRC				332 75		
7	DS1 standard additional system	MRC				113 83		
2	DS3 protected, 1st 1/4 alm	MRC				1,222 72		
7	DS3 protected, ea add1 1/4 alm	MRC				27 41		
*	DS1 to voice multiplexing	MRC				166 67		
9	DS3 to DS1 multiplexing	MRC				464 26		
/_	4 wre voice	NRC				104 91		
10	2 were voice	NRC				104 91		
1977 40	DS1 standard first system	NRC				788 08		
14	DS1 standard edditional system	NRC				113 83		
14	DS3 protected, 1st 1/4 aim	NRC				766 06		
-	DS3 protected, ea add1 1/4 alm	NRC				26 27		
15	DS1 to voice multiplexing	NRC				672 54		
/6	DS3 to DS1 multiplexing	NRC				394 04		
17	Total Entrance Facility Revenue							
	Direct Trunked Transport	20020000				20.00		
18	Voice facility	MRC/ALM				\$6.56		
19	DS1 facility	MRCIALM				13.13		
40 21 22 23	DS1 termination	MRC/TERM				42 03		
۵/	DS3 facility	MRC/ALM				116 02		
22	DS3 termination	MRC/TERM				350 26		
23	DS1 to voice multiplexing	MRC				166 67		
44	DS3 to DS1 multiplexing	MRC				464.26		
25		NRC				672.54		
26		NRC				394.04		
97	Total Direct Trunked Revenue:							
	Tendem Switched Transport							
700	Premium facility	MOUMMLE				\$0.00001920		
47 0	Nonpremium facility	MOUMILE				0.00000060		
0000000	Premium termination	MOU/TERM				0.00013470		
3/ 0	Nonpremium termination	MOUTERM				0.00006060		
370	Premium tendem switching	MOU				0.00003290		
39 0	Nonpremium tandem switching	MOU				0.00041980		
34 -1	MPB expense adjustment						_	
35	Total Tandem Switched Revenue:							

36 Total Facility Based Restructured Revenue:

						Production of C	Attachment 1 locuments No. 4
				^		110000000101	Page 5 of 5
		B	C	0	E	7	6
		0	_	100%	75%	,	G
	GTE FLORIDA - TRANSPORT OCC		Existing	Reconfigured	Reconfigured		
	A	Charging	Units	Units	Units	LTR Rates	Revenues
	**	Method			(0)	(b)	(c = a * b)
	Entrance Eachty						
/	4 wire voice	MRC				\$48 69	
1237567800	2 wire voice	MRC				30 43	
3.	DS1 standard first system	MRC				332 75	
4	DS1 standard additional system	MRC				113 83	
5	DS3 protected, 1st 1/4 aim	MRC				1,222 72	
6	DS3 protected, ea add'l 1/4 alm	MRC				27 41	
7	DS1 to voice multiplexing	MRC				166 67	
9	DS3 to DS1 multiplexing	MRC				464 26	
9	4 were voice	NRC				104 91	
10	2 wire voice	NRC				104 91	
11	DS1 standard first system	NRC				788 08	
12	DS1 standard additional system	NRC				113 83	
13	DS3 protected, 1st 1/4 aim	NRC				788 08	
14	DS3 protected, ea add'l 1/4 alm	NRC				26 27	
15	DS1 to voice multiplexing	NRC				672 54	
いなるとから	DS3 to DS1 multiplexing	NRC				394 04	
17	Total Entrance Facility Revenue					-	_
	Direct Irunked Iransport						
18	Voice facility	MRC/ALM				\$6.56	
19	DS1 facility	MRCIALM				13 13	
20	DS1 termination	MRC/TERM				42 03	
2/	DS3 facility	MRCIALM				116.02	
33	DS3 termination	MRC/TERM				350.26	
23	DS1 to voice multiplexing	MRC				166 67	
24	DS3 to DS1 multiplening	MRC				464.26	
05	DS1 to voice muliplexing	NRC				672.54	
35	DS3 to DS1 multiplexing	NRC				394.04	
97	Total Direct Trunked Revenue:					7000	-
	Tandem Switched Transport						
20	Premium facility	MOUMMLE				\$0.00001920	
990		MOUMILE				0.00000060	
30 0	Premium termination	MOUVTERM				0.00013470	
3/ 0	Nonpremium termination	MOUVTERM				0.00006060	
3000	Premium tandem switching	MOU				0.00093290	
33	Nonpremium tandem switching	MOU				0.00041960	
80000008	m n expense expensions					Section 1985	
3500	Total Tandem Switched Revenue:						

36 Total Facility Based Restructured Revenue:

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Notice of Service, Responses to Staff's First Request for Production of Documents and Request for Confidential Classification and Motion for Protective Order in Docket No. 921074-TP was sent by U. S. mail on April 15, 1994, to the parties on the attached list.

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## MENORANDUM

## April 15, 1994

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 WASTEWATER  DIVISION OF LEGAL SERVICES
FROM:	DIVISION OF RECORDS AND REPORTING (FLYNN)
RE:	CONFIDENTIALITY OF CERTAIN INFORMATION  DOCUMENT NO. 03522-94
	DESCRIPTION: Material produced in response to Staff's  first request for POD. No. 3
	SOURCE: STE Florida DOCKET NO.: 921074-TP
the at and for memora of you	The above material was received with a request for lentiality (attached). Please prepare a recommendation for storney assigned to the case by completing the section below broarding a copy of this memorandum, together with a brief andum supporting your recommendation, to the attorney. Copies ar recommendation should also be provided to the Division of 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.