

Marceil Morrell\*  
Vice President & General Counsel - Florida

Leslie Reicin Stein  
Associate General Counsel

Attorneys

Lorin H. Albeck  
Kimberly Caswell  
Franklin H. Deak

M. Eric Edgington  
Joe W. Foster  
Ernesto Mayor, Jr.

\* Not Admitted in Florida

GTE Telephone Operations

One Tampa City Center  
Post Office Box 110, FLTC0007  
Tampa, Florida 33801  
813-224-4001  
813-228-5257 (Facsimile)

ORIGINAL  
FILE COPY

Ms. Blanca S. Bayo, Director  
Division of Records & Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

April 29, 1994

Re: Docket No. [REDACTED]  
Expanded Interconnection Phase II and Local Transport  
Restructure

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of a Request for Confidential Classification and Motion for Permanent Protective Order regarding certain material produced in response to Staff's First Set of Interrogatories, Question No. 14.

The confidential information has been highlighted in yellow and placed in a separate envelope marked "Confidential" for your convenience. Also submitted with this package are two edited versions of the confidential information.

Service has been made on the parties of record as evidenced by the Certificate of Service.

Very truly yours,

  
Kimberly Caswell

KC:tas  
Enclosures

RECEIVED & FILED  
MAY 1 1994  
FPSC-BUREAU OF RECORDS

A part of GTE Corporation

DOCUMENT NUMBER-DATE

04013 APR 29 94

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection)	Docket No. 921074-TP
Phase II and Local Transport )	Docket No. 930955-TL
Restructure )	Docket No. 940014-TL
_____ )	Docket No. 940020-TL
	Docket No. 931196-TL
	Docket No. 940190-TL

Filed: April 29, 1994

GTE FLORIDA INCORPORATED'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION AND MOTION FOR PERMANENT 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 First Set of Interrogatories 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, attached to this Request as Exhibit B, have been sent to the parties.

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."

DOCUMENT NUMBER-DATE

04013 APR 29 8

FPSC-RECORDS/REPORTING

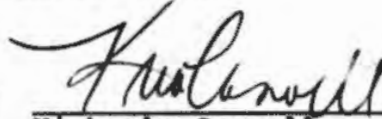
The confidential information covered in this filing appears in GTEFL's response to Question 14. It is the total investment figure for GTEFL's tandem switch, along with the switch vendor. This information could be used by actual and potential competitors to help determine GTEFL's cost structure, and relative cost position in the industry. With this information, competitors could better assess their chances of competing successfully in a particular market and tailor their strategies accordingly.

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.

For these reasons, GTEFL asks the Prehearing Officer to enter an order declaring the above-described information in GTEFL's response to Question 14 to be confidential and thus protected from public disclosure.

Respectfully submitted on April 29, 1994.

By:

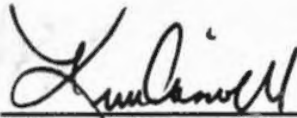


Kimberly Caswell  
Post Office Box 110, MC FLTC0007  
Tampa, Florida 33601  
Telephone: 813-228-3094

Attorney for  
GTE Florida Incorporated

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Request for Confidential Classification and Motion for Permanent Protective Order in Docket No. 921074-TP was sent by U. S. mail on April 29, 1994, to the parties on the attached list.



\_\_\_\_\_  
Kimberly Caswell

Staff Counsel  
Florida Public Service  
Commission  
101 East Gaines Street  
Tallahassee, FL  
32399-0865

Harris R. Anthony  
J. Phillip Carver  
c/o Marshall Criser III  
150 S. Monroe Street  
Suite 400  
Tallahassee, FL 32301

Patrick K. Wiggins  
Kathleen Villacorta  
Wiggins & Villacorta  
P. O. Drawer 1657  
Tallahassee, FL  
32302

David B. Erwin  
Young VanAssenderp  
225 S. Adams St.  
Suite 200  
Tallahassee, FL 32302

Michael W. Tye  
AT&T Communications Inc.  
106 East College Avenue  
Suite 1410  
Tallahassee, FL 32301

Peter M. Dunbar  
Haben Culpepper  
Dunbar & French  
P. O. Box 10095  
Tallahassee, FL  
32302

Office of Pub. Counsel  
Claude Pepper Building  
111 W. Madison Street  
Room 812  
Tallahassee, FL 32399-  
1400

Harriet Eudy  
ALLTEL Florida, Inc.  
P. O. Box 550  
Live Oak, FL 32060

Jeff McGehee  
Southland Tel. Co.  
210 Brookwood Road  
P. O. Box 37  
Atmore, AL 36504

Lee L. Willis  
Ausley McMullen McGehee  
Carothers & Proctor  
P.O. Box 391  
Tallahassee, FL 32302

Joseph McGlothlin  
Vicki Gordon Kaufman  
McWhirter Grandoff and  
Reeves  
315 S. Calhoun St.  
Tallahassee, FL 32301

Daniel V. Gregory  
Quincy Tel. Co.  
P. O. Box 189  
Quincy, FL 32351

John A. Carroll, Jr.  
Northeast Fla. Tel. Co.  
P. O. Box 485  
Macclenny, FL 32063-  
0485

Charles L. Dennis  
Indiantown Tel. Sys. Inc.  
P.O. Box 277  
Indiantown, FL 34956

Joseph P. Gillan  
Gillan and Assoc.  
P.O. Box 541038  
Orlando, FL 32854-  
1038

Brad Mutschelknaus  
Danny E. Adams  
Rachel Rothstein  
Wiley Rein Fielding  
1776 K Street N.W.  
Washington, DC 20006

F. B. Poag  
Dir.-Tariffs & Reg.  
Sprint/United-Florida  
P.O. Box 165000  
Mail Code #5326  
Altamonte Springs, FL  
32716-5000

C. Everett Boyd Jr.  
Ervin Varn Jacobs  
Odom & Ervin  
305 S. Gadsden St.  
Tallahassee, FL  
32301

Chanthina R. Bryant  
Sprint  
3065 Cumberland Circle  
Atlanta, GA 30339

Paul Jones  
Time Warner Cable  
Corporate Hdqtrs.  
300 First Stamford Pl.  
Stamford, CT  
06902-6732

Jodie L. Donovan  
Regulatory Counsel  
Teleport Comm. Group  
1 Teleport Drive  
Suite 301  
Staten Island, NY  
10311

Mickey Henry  
MCI Telecomm. Corp.  
780 Johnson Ferry Rd  
Suite 700  
Atlanta, GA 30342