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May 26, 1994

IN REPLY REFER TO:  
Tallahassee

## BY HAND DELIVERY

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: In re: Expanded Interconnection Phase II and  
Local Transport Restructure; Docket Nos. 921074-TP,  
930955-TL, 940014-TL, 940020-TL and 931196-TL

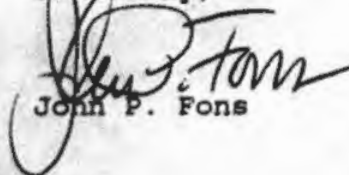
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Central Telephone Company of Florida's Request for Confidential Classification. Attachment "A" to this document represents an edited version of the documents to which this Request relates. The unedited version of Attachment "A" has been submitted to the Division of Records and Reporting under a separate confidential cover.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



John P. Fons

JPF/csu  
Enclosures

cc: All Parties of Record (w/encls.)

cen\bayo-1.rcc

DOCUMENT NUMBER-DATE  
05186 MAY 26 1994  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection ) Docket No. 921074-TP,  
Phase II and Local Transport ) 930955-TL, 940014-TL,  
Restructure ) 940020-TL, and 931196-TL  
\_\_\_\_\_ ) Filed: May 26, 1994

CENTRAL TELEPHONE COMPANY OF FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Central Telephone Company of Florida ("Sprint/Centel-Florida" or the "Company"), by and through its undersigned counsel, and in accordance with Section 25-22.006, Florida Administrative Code, files this Request for Confidential Classification within twenty-one days of filing its Notice of Intent to Request Confidential Classification, and says:

1. Sprint/Centel-Florida requests that the documents previously submitted to the Division of Records and Reporting on May 9, 1994, with the information asserted to be confidential highlighted in yellow, be classified as "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes (1991). Attachment "A" is an edited version of the documents on which the information asserted to be confidential has been blocked out.

2. Documents Nos. 1 and 2 of Attachment "A" were provided to the Division of Records and Reporting, together with a Notice of Intent to Request Confidential Classification, on May 9, 1994, as a Supplemental Response to Staff's First Set of Interrogatories, No. 3.

DOCUMENT NUMBER-DATE

05186 MAY 26 8

FPSC-RECORDS/REPORTING

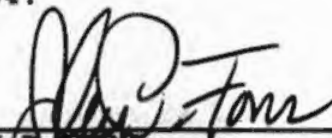
3. Document No. 1 of Attachment "A" reflects the revenues that Centel is currently receiving and will receive from a "large" IXC resulting from the restructure of local transport. Document No. 2 of Attachment "A" reflects the revenues that Centel is currently receiving and will receive from a "medium" IXC resulting from the restructure of local transport. The highlighted and redacted portions of these documents should be considered confidential because disclosure of that information would harm the Company's ratepayers and/or the business operations of the Company and its IXC customers.

4. The line-by-line and page-by-page justification required by Section 25-22.006(4), Florida Administrative code, including statements concerning how the ratepayers and/or the business operations of the Company and its IXC customers will be harmed if this information is disclosed to the public, is attached hereto and incorporated herein by reference as Attachment "B."

5. The information in Attachment "A" is intended to be and is treated by Sprint/Centel-Florida as private, confidential information and has not been disclosed to the public.

WHEREFORE, Sprint/Centel-Florida respectfully requests that the Commission issue an order declaring that the highlighted and redacted information in the documents in Attachment "A" is proprietary confidential business information and exempt from disclosure under the public records laws of the State of Florida.

DATED this 26th day of May, 1994.

  
\_\_\_\_\_  
JOHN P. FONS  
Macfarlane Ausley Ferguson  
& McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(904) 224-9115

ATTORNEYS FOR CENTRAL TELEPHONE  
COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 26th day of May, 1994, to the following:

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Peter Dunbar  
Pennington, Haben, et al.  
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Tallahassee, FL 32301

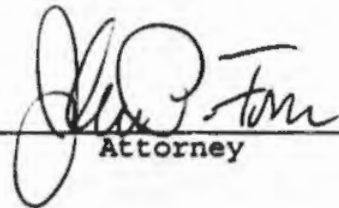
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Richard D. Melson  
Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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CENTRAL TELEPHONE COMPANY OF FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL DOCUMENTS

Edited Version

ATTACHMENT "A"

Supplemental Response to Staff's  
1st Set of Interrogatories  
Interrogatory No. 3  
Central Telephone Co. of Florida  
Docket No. 940020-TL

Document No. 1

# CONFIDENTIAL

Supplemental Response to Staff's  
1st Set of Interrogatories  
Interrogatory No. 3  
Central Telephone Co. of Florida  
Docket No. 940020-TL  
Page 1 of 4

1 Sprint/Centel - Florida

2 With the BHMOC Incorporated into the RIC

A

B

3 LARGE

4 Current Element

Revenue

5 Local Transport

6 BHMOC

7 Total

8 Proposed Element

Revenue

9 Interconnection

10 Tandem Switched

11 Direct Trunked

12 Entrance Facilities

13 Interconnection (BHMOC)

14 Total

15 Revenue Change

\$ (6,791)

16 Percent Change

-0.1%



Supplemental Response to Staff's  
1st Set of Interrogatories  
Interrogatory No. 3  
Central Telephone Co. of Florida  
Docket No. 940020-TL

Document No. 2

# CONFIDENTIAL

1 Sprint/Centel - Florida

2 With the BHMOC Incorporated into the RIC

A

B

3 MEDIUM

4 Current Element

Revenue

5 Local Transport

6 BHMOC

7 Total

8 Proposed Element

Revenue

9 Interconnection

10 Tandem Switched

11 Direct Trunked

12 Entrance Facilities

13 Interconnection (BHMOC)

14 Total

15 Revenue Change

\$ 62,704

16 Percent Change

4.0%

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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CENTRAL TELEPHONE COMPANY OF FLORIDA'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL DOCUMENTS

Line-by-Line Justification

ATTACHMENT "B"

The following data on the documents identified as Attachment "A" is confidential.

Document No.	Page	Data Point	Line(s)	Columns	Justification
1	1 of 4	--	5-7, 9-14	B	Note 1
2	2 of 4	--	5-7, 9-14	B	Note 2

Note 1: The information displayed in the Supplemental Response to Staff's First Set of Interrogatories (page 1 of 4) gives a comprehensive picture of the amount of revenue that Centel is receiving and will receive from its only "large" IXC for the local transport access element. It is patently obvious which IXC is Centel's "large" IXC. Inherent to this information is significant market data about the size of the competitive local transport market and this IXC customer which competitors will have at no cost if it is publicly disclosed. This is information which Centel and its IXC customers traditionally treat as proprietary confidential business information as contemplated in Section 364.183, Florida Statutes (1993). By having access to this valuable market information, access and long distance competitors will be able to gauge the size of the local transport market and make their business decisions as to what markets they will find profitable to enter. In that respect, disclosure of this information will harm the Company's customers and its operations.

Note 2: The information displayed in the Supplemental Response to Staff's First Set of Interrogatories (page 2 of 4) gives a

comprehensive picture of the amount of revenue that Centel is receiving or will receive from its "medium" sized IXC - this is a composite picture. Inherent to this information is significant market data about the size of the competitive local transport market which the Company's competitors will have at no cost if publicly disclosed. This is information which Centel traditionally treats as proprietary confidential business information as contemplated in Section 364.183, Florida Statutes (1993). By having access to this information, the Company's access competitors will be able to gauge the size of the local transport market and make their business decisions as to what markets they will find profitable to enter. In this respect, disclosure of this information will harm the Company's customers and its operations.

**M E M O R A N D U M**

May 26, 1994

**TO:** \_\_\_\_\_ **DIVISION OF APPEALS**  
\_\_\_\_\_ **DIVISION OF AUDITING AND FINANCIAL ANALYSIS**  
X \_\_\_\_\_ **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.** ~~XXXXXXXXXX~~ (ref 04444-94)

**DESCRIPTION:** Supplemental Response to Interrogatory  
No. 3 of Staff's First Set

**SOURCE:** Central Telephone Company of Florida

**DOCKET NO.:** ~~XXXXXXXXXX~~ et al.

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

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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.
- \_\_\_\_\_ The utility has provided enough details to perform a reasoned analysis of its request.
- \_\_\_\_\_ The material has been received incident to an inquiry.