



GTE Telephone Operations

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September 12, 1994

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

Re: Docket No. ~~921074-1P~~  
Expanded Interconnection Phase II and Local Transport  
Restructure

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of GTE Florida Incorporated's Notice of Service of Responses to Staff's First Set of Interrogatories (Question No. 8). Also enclosed are an original and fifteen copies of a Request for Confidential Classification and Motion for Protective Order in connection with these responses.

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  
*Mus*  
FPSC-BUREAU OF RECORDS

*Req. for Confid. Confid.*  
DOCUMENT NUMBER-DATE    DOCUMENT NUMBER-DATE

A part of GTE Corporation    09355 SEP 12 1994    09356 SEP 12 1994

FPSC-RECORDS/REPORTING    FPSC-RECORDS/REPORTING

*Notice Sent*  
DOCUMENT NUMBER-DATE  
09357 SEP 12 1994  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Filed: Sept. 12, 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 included in GTEFL's responses to the Commission Staff's First Set of Interrogatories in this proceeding.

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. Exhibit C is the required line-by-line listing of the confidential material addressed in this Request.

This Request covers certain information in GTEFL's response to question 8 of Staff's First Set of Interrogatories (GTEFL's responses to all the other interrogatories were submitted earlier). The data at issue are GTEFL's costs for a number of types of equipment, along with installation.

All of these data fit 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."

GTEFL regards  
DOCUMENT NUMBER-DATE  
09355 SEP 12 8  
FPSC-RECORDS/REPORTING

the material and labor costs for its multiplexing and fiber optic terminal equipment as highly confidential because this information would help competitors to compute the lowest cost at which GTEFL could provide services that use this equipment. With these data, GTEFL's competitors could ensure their success in competing against GTEFL without having to endure the usual marketplace trial and error. Disclosure of this cost information would thus place GTEFL at an unfair competitive disadvantage.

In addition, information about equipment costs is closely guarded by the vendors of the equipment. Public disclosure of the prices given to GTEFL could harm the vendor's ability to negotiate with other customers. It could also harm GTEFL's ability to secure favorable prices from vendors in the future. If a vendor believes its prices will be disclosed by GTEFL in regulatory proceedings, that vendor will be reluctant to offer GTEFL discounts which may be used later as leverage by other potential customers.


GTEFL believes the Commission customarily grants confidential protection to companies' cost data. Confidential treatment is particularly appropriate here, however, because this proceeding will establish the guidelines for further competition for access services--already one of the most competitive segments of the LECs' business. In a competitive market, any information gained about a competitor can be used to the company's detriment. This result obviously harms the company to which the information pertains. Disclosure will also harm consumers in the long term. The market will be skewed because competitors will unfairly gain a market

advantage through disclosure of information in a regulatory proceeding, rather than through the usual market trial and error.

For all these reasons, GTEFL asks the Commission to issue an order declaring the information described in this request to be confidential and protecting it from public disclosure. Upon conclusion of this matter, GTEFL asks that the confidential information be returned to the Company.

Respectfully submitted on September 12, 1994.

By:

  
Kimberly Caswell  
Post Office Box 110, MC 7  
Tampa, Florida 33601  
Telephone: 813-228-3094

Attorney for  
GTE Florida Incorporated

Docket No.s 921074-TP, 930955, 940014, 940020, 931196, 940190  
GTE Florida's Responses to Staff's  
First Set of Interrogatories, Question No. 8  
Page 2

- 8) Provide the actual costs for the equipment itself and the incremental installation costs for the items listed below:
- a. A M01 and M10, respectively, multiplexing channel bank equipment; including all common equipment and excluding the circuit plug in packs.
  - b. An individual circuit plug in pack for the M01 and M10 respectively, multiplexing channel bank identified in 8a.
  - c. A M13 and M31, respectively, multiplexing channel bank equipment including all common equipment and excluding the circuit plug in packs.
  - d. An individual circuit plug in pack for the M13 and M31, respectively, multiplexing channel bank identified in 8c.
  - e. A 135 Mbs, 565 Mbs, and 1.2 Gbs, respectively, lightwave terminal including all common equipment and excluding the circuit plug in packs.
  - f. An individual circuit plug pack for each lightwave terminal, respectively, identified in 8e.

**Response:**

- (a) M01/M10 - D4 Channel Bank

D4 Channel Bank e/w 3 shelves      \$

Approximate Installation Labor      \$

- (b) D4 Channel Unit\*      \$

\*Note: Figure includes engineering and installation.

- (c) M13/D31 - RC 28D

Shelf and Common Equipment      \$



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GTE Florida's Responses to Staff's  
First Set of Interrogatories, Question No. 8  
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Approximate Installation Labor      \$

- (d) GTEFL typically installs the M13 and M31 MUX fully equipped, hence, no circuit plug-in pack is required.
- (e) The following are GTEFL equivalent systems with corresponding equipment and installation costs. The fiber optic terminals shown are equipped as indicated. Hence the equipment and installation costs of a plug in pack(s) for all three systems are reflected in the cost figures below.

	<u>Equivalent System</u>	<u>Equipment</u>	<u>Installation</u>
135 Mb/s	150 Mb/s e/w 3 DS-3's	\$	\$
565 Mb/s	565 Mb/s e/w 12 DS-3's	\$	\$
1.2 Gb/s	1.12 Gb/s e/w 24 DS-3's	\$	\$

- (f) Please refer to response 8(e) above.

**EXHIBIT C**

<u>Page</u>	<u>Line</u>	<u>Column</u>	<u>Reason</u>
1	2	B	D4 channel bank cost
1	3	B	D4 channel bank installation cost
1	4	B	D4 channel unit cost
1	6	B	M13/D31-RC 28D shelf and common equipment cost
2	1	B	M13/D31-RC 28D installation cost
2	2	B-C	150 Mb/s e/w 3 DS-3 system cost, equipment and installation
2	3	B-C	565 Mb/s e/w 12 DS-3 system cost, equipment and installation
2	4	B-C	1.12 Gb/s e/w 24 DS-3 system cost, equipment and installation

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

September 2, 1994

**TO:**  
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X **DIVISION OF APPEALS**  
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**DIVISION OF AUDITING AND FINANCIAL ANALYSIS**  
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**DIVISION OF COMMUNICATIONS**  
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**DIVISION OF ELECTRIC AND GAS**  
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**DIVISION OF RESEARCH**  
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**DIVISION OF WATER AND WASTEWATER**  
\_\_\_\_\_  
**DIVISION OF LEGAL SERVICES**

**FROM:** **DIVISION OF RECORDS AND REPORTING (FLYNN)**

**RE:** **CONFIDENTIALITY OF CERTAIN INFORMATION**

**DOCUMENT NO.** 921074-34

**DESCRIPTION:** Response to Staff's 1st Set of Interrog-  
stories, No. 8, Exhibit A

**SOURCE:** GTE Florida

**DOCKET NO.:** 921074-34

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