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September 23, 1994

ORIGINAL  
FILE COPY

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

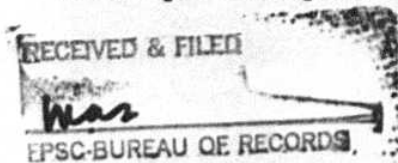
Re: In re: Expanded Interconnection Phase II and  
Local Transport Restructure; Docket Nos. 931074-TP,  
930955-TL, 940014-TL, 940020-TL and 931196-TL

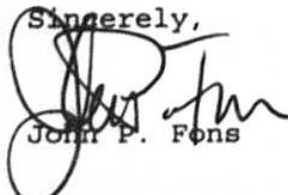
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of United's/Centel's Request for Confidential Classification. Attachment "A" to this document represents an edited version of Attachment A of Late-Filed Exhibit No. 43 to which this Request relates. The unedited version of Attachment "A" has been submitted to the Division of Records and Reporting under 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

utd\bayo.rcc

DOCUMENT NUMBER-DATE

09842 SEP 23 1994

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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 ) Filed: September 23, 1994

UNITED'S/CENTEL'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION

United Telephone Company of Florida and Central Telephone Company of Florida ("United/Centel" or the "Companies"), by and through their undersigned counsel, and in accordance with Section 25-22.006, Florida Administrative Code, file this Request for Confidential Classification, and say:

1. Attachment A of Late-Filed Exhibit No. 43 reflects United's/Centel's analysis of and corrections to Late-Filed Exhibit No. 39 submitted by witness Gillan. The highlighted, unredacted portions of Attachment A should be considered confidential because disclosure of that information would harm the Companies' ratepayers and/or the business operations of the Companies and its IXC customers.

2. 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 Companies will be harmed if this information is disclosed to the public, is attached hereto and incorporated herein by reference as Attachment "B."

DOCUMENT NUMBER-DATE

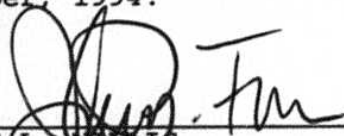
09842 SEP 23 8

FPSC-RECORDS/REPORTING

3. The information in Attachment A of Late-Filed Exhibit No. 43 is intended to be and is treated by United/Centel as private, confidential information and has not been disclosed to the public.

WHEREFORE, United/Centel respectfully request that the Commission issue an order declaring that the highlighted, unredacted information in Attachment A of Late-Filed Exhibits No. 43 is proprietary confidential business information and exempt from disclosure under the public records laws of the State of Florida.

DATED this 23rd day of September, 1994.



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& McMullen  
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ATTORNEYS FOR UNITED TELEPHONE  
COMPANY OF FLORIDA AND CENTRAL  
TELEPHONE COMPANY OF FLORIDA

**CERTIFICATE OF SERVICE**

Docket No. 921074-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 23rd day of September, 1994, to the following:

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c/o Richard Fletcher  
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Tampa, FL 32063



\_\_\_\_\_  
Attorney

cen\lfe-rcc

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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UNITED'S/CENTEL'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL DOCUMENTS

Edited Version

ATTACHMENT "A"

**UNITED'S/CENTEL'S ANALYSIS OF AND  
CORRECTIONS TO LATE-FILED EXHIBIT NO. 39.**

The cost data used in Mr. Gillan's analysis was based on DS1 and DS3 end user service configurations.<sup>1</sup> These are not appropriate for developing "local transport" DS1 and DS3 costs. The end user DS1/DS3 cost study did not include DS1 to DS3 multiplexing at the originating central office as the DS3 service was provisioned as a through-circuit, i.e., received from the end user customer at the DS3 level. In addition, multiplexing and cross-connect equipment would have to be added at the terminating central office for developing the cost of the DS1 "local transport" service. This equipment is not required for the DS3 customer at the terminating end office since that is the fiber interoffice transmission level. This equipment is, however, required for the DS1 "local transport" service since the transmission over fiber is at the DS3 level and the additional equipment is necessary to deliver the "local transport" service at the DS1 level to the IXC.

In addition, the end user study included remote switches which would not be used for "local transport" service since routing would be done at the host switch. This impacts the types of investments

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<sup>1</sup> United's TransLink and LightLink dedicated services cost support

for transmission equipment which would be appropriate in a remote switch for the end user study but not for a "local transport" service cost study.

Using the corrected investment components and resulting monthly cost (see attached supporting documents pages 3, 4, 5 and 6 following) produces the following cost comparison and cost difference for DS3/DS1 "local transport" service:

Monthly Cost Comparison

	<u>A</u>	<u>B</u>
	<u>Fixed</u>	<u>Mileage</u>
1 DS3		
2 DS1		

Difference

	<u>Fixed</u>	<u>Mileage</u>
3 DS3/28		
4 DS1		
5		



**DS3/DS1 COST COMPARISON**  
**(Local Transport Service)**

ORIGINATING CENTRAL OFFICE

TERMINATING CENTRAL OFFICE

Equipment                      Monthly Cost              Monthly Cost              Total Cost

A

B

C

DS3

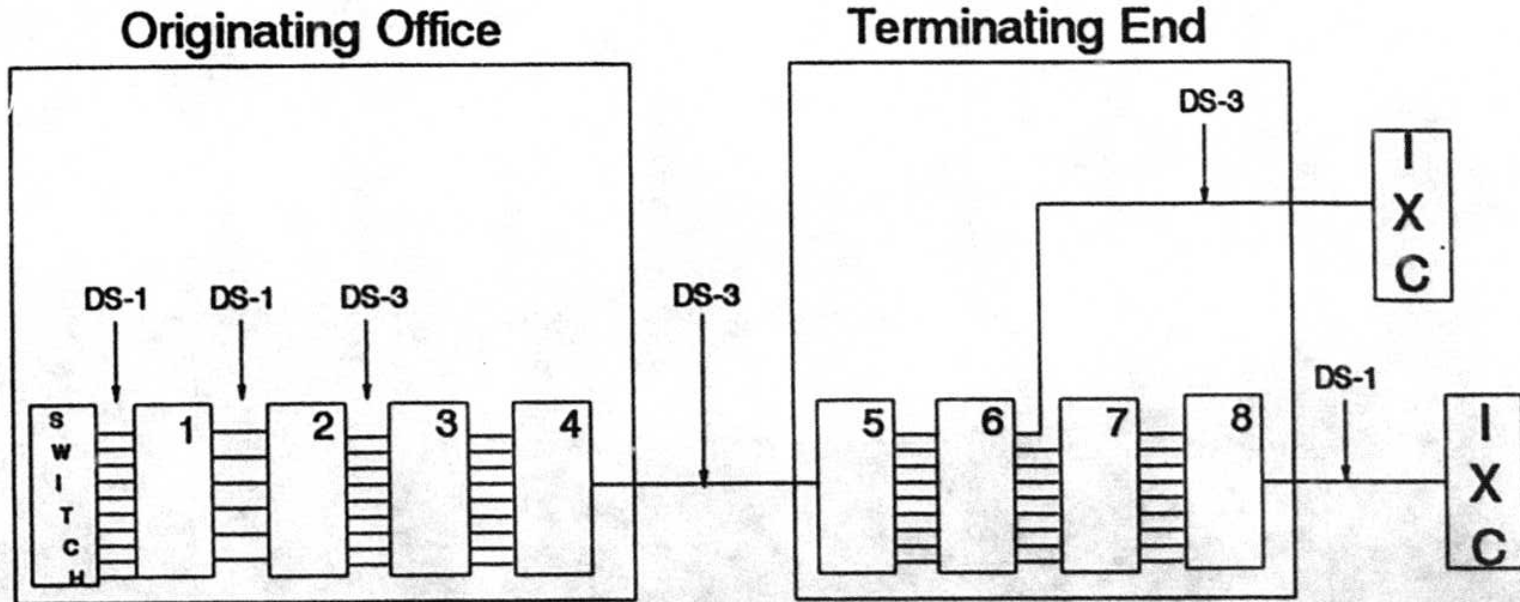
- 1 DSX-1 CROSS CONN.
- 2 M13 MUX
- 3 DSX 3/4 X-CONN
- 4 OC48
- 5

DS1

- 6 DSX-1 CROSS CONN.
- 7 M13 MUX
- 8 DSX 3/4X-CONN
- 9 OC48

10

## UNITED TELEPHONE COMPANY OF FLORIDA



1. DSX-1 Cross Connect Panel
2. M13 Multiplexer
3. DSX-3/4 Cross Connect Panel
4. OC-48 Fiber Optic Terminal

5. OC-48 Fiber Optic Terminal
6. DSX-3/4 Cross Connect
7. M13 Multiplexer
8. DSX-1 Cross Connect

UNITED TELEPHONE COMPANY OF FLORIDA

ORIGINATING OFFICE

EQUIPMENT

TERMINATING OFFICE

COST PER MONTH

COST PER MONTH

TOTAL COST PER MONTH

A

B

C

DS-3:

DS-3:

DSX-1 CROSS CONNECT PANEL  
 M13 MULTIPLEXER  
 DSX-3/4 CROSS CONNECT PANEL  
 OC-48 FIBER OPTIC TERMINAL

TOTAL DS-3 COST

TOTAL DS-3 COST/28

DS-1:

DS-1:

DSX-1 CROSS CONNECT  
 M13 MULTIPLEXER  
 DSX 3/4  
 OC-48 FIBER OPTIC TERMINAL

TOTAL DS-1 COST

DS-3 vs DS-1 Cost Differential

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12

UNITED TELEPHONE COMPANY OF FLORIDA

DS-3/DS-1 WORKSHEET

	(1)	(2)	(3)	(4)	(5)
<u>EQUIPMENT</u>	<u>ORIGINAL INVESTMENT</u>	<u>UTILIZATION FACTOR</u>	<u>(1) / (2) LOADED INVESTMENT</u>	<u>ANNUAL CHARGE FACTOR</u>	<u>[(3) * (4)] / 12 COST PER MONTH</u>
	A	B	C	D	E
<u>DS-3 ORIGINATING OFFICE</u>					
1 DSX-1					
2 M13 MULTIPLEXER					
3 DSX 3/4					
4 OC-48 FIBER OPTIC TERMINAL					
<u>DS-3 TERMINATING OFFICE</u>					
5 DSX 3/4					
6 OC-48 FIBER OPTIC TERMINAL					
<u>DS-1 ORIGINATING OFFICE</u>					
7 DSX-1					
8 M13 MULTIPLEXER					
9 DSX 3/4					
10 OC-48 FIBER OPTIC TERMINAL					
<u>DS-1 TERMINATING OFFICE</u>					
11 OC-48 FIBER OPTIC TERMINAL					
12 DSX 3/4					
13 M13 MULTIPLEXER					
14 DSX-1					

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection ) Docket Nos. 921074-TP,  
Phase II and Local Transport ) 930955-TL, 940014-TL,  
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UNITED'S/CENTEL'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL DOCUMENTS

Line-by-Line/Page-by-Page  
Justification

ATTACHMENT "B"

The following data on Attachment A of Late-Filed Exhibit No. 43 is confidential.

<u>Attach- ment</u>	<u>Page</u>	<u>Line(s)</u>	<u>Columns</u>	<u>Justification</u>
A	2	1-5	A,B	Note 1
	3	1-10	A-C	Note 1
	5	1-12	A-C	Note 1
	6	1-14	A-E	Note 1

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**Note 1:** This information consists of a variety of cost factors and investment data that are essential to the development of the Company's Light Link and TransLink Cost Study. In addition, there are cost and investment data with respect to equipment which would be required to make these studies applicable to "local transport" service. This data is not readily available elsewhere and depends upon a variety of Company conducted empirical analyses and is valuable to the Company's operations and customers. Because it is not readily available elsewhere, it would also be valuable to the Company's competitors as they develop their pricing strategies. As such, public disclosure of this proprietary confidential business information would harm the Company's operations and customers. Therefore, this data qualifies as proprietary confidential business information as that term is defined in Section 364.183, Florida Statutes, and should be protected from public disclosure.

MEMORANDUM

September 26, 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. 92243-94

DESCRIPTION: Late-Filed Exhibit No. 43

SOURCE: United/Centel

DOCKET NO.: 922074-12

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