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October 14, 1994

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

Re: Docket No. **921074-TP**

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Fifth Request for Confidential Treatment of Data to be filed in the above mentioned docket. The proprietary confidential information is contained in Southern Bell's Late-filed Hearing Exhibit No. 30.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of Southern Bell's Request have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Mary Jo Peed (MS)
Mary Jo Peed

Enclosures

cc: Robert G. Beatty
A. M. Lombardo
R. Douglas Lackey
All Parties noted on Certificate of Service

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28
DIVISION OF RECORDS

DOCUMENT NUMBER-DATE

10541 OCT 14 8

FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)

) October 14, 1994

**BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
FIFTH REQUEST FOR CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to Rule 25-22.006 (5)(c), Florida Administrative Code, and files its Fifth Request for Confidential Classification.

1. The hearings in the above-styled docket were held on August 22, 1994, through August 24, 1994. During the testimony of Southern Bell's witness, Jerry Hendrix, the Florida Public Service Commission Staff ("Staff") requested that Mr. Hendrix submit a late filed exhibit to be filed on September 23, 1994. The late filed exhibit was assigned Exhibit No. 30 for identification purposes.

2. On September 23, 1994, Southern Bell filed its late filed Hearing Exhibit No. 30 and its Sixth Notice of Intent to Request Confidential Classification ("Sixth Notice"). The Sixth Notice was required because some of the information provided in Late-filed Hearing Exhibit No. 30 is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes.

3. Pursuant to Rule 25-22.006(3)(a), Southern Bell is, within the 21 days allowed by the Rule, filing its request for

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FPSC-RECORDS/REPORTING

confidential classification of the information it contends is proprietary confidential business information.

4. Pursuant to Rule 25-22.006, Florida Administrative Code, Southern Bell is affixing as Attachment "A" a listing identifying the page and line number at which the confidential material found. Southern Bell has affixed as Attachment "B" two copies of the material in which the proprietary confidential business information has been redacted. Appended hereto as Attachment "C" is one copy of the material with the proprietary confidential business information highlighted. The material for which confidential classification is sought is intended to be and is treated by Southern Bell as private and has not been disclosed.

5. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirements of public disclosure of §119.07, Florida Statutes. The information found on page 2 of 5 at lines 24, 26, 28, 30, and 32 through 36 reflect the cost of providing DS1 and DS3 transport services. These costs were derived from a long run incremental cost study which examined DS1 and DS3 transport services on a generic basis and is not readily available elsewhere. This information relates to the competitive interests of Southern Bell and disclosure would impair the competitive business of Southern Bell. The record in this proceeding clearly established that access transport services, whether special or switched are competitive

in Florida. (See, Hearing Transcript, Docket No. 921074-TP pp. 63-64; 67-68). Further, the Commission has authorized expanded interconnection for alternative access vendors for special access and private line services and is considering, in this docket, expanded interconnection for alternative access vendors for switched access services. Special access and private line services are also considered to be substitutable services for the switched access services of the local exchange companies. For these reasons, the disclosure of the data contained in Late Filed Hearing Exhibit No. 30 would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services.

WHEREFORE, Southern Bell requests that the Commission grant its request for confidential treatment.

Respectfully submitted this 14th day of October, 1994.

ATTORNEYS FOR
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CERTIFICATE OF SERVICE
Dockets No. 921074-TL, 930955-TL,
940014-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *14th* day of *OCTOBER* 1994,
to:

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Attachment A

SOUTHERN BELL TEL. & TEL. CO.
FPSC DOCKET 921074-TP
HENDRIX LATE FILED EXHIBIT NO. 30
(Exhibit Filed 9/23/94)

Explanation for Confidentiality Request

This information contains actual incremental unit cost information for a generic DS1 and a generic DS3 interoffice transmission. This cost data is not readily available elsewhere and would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services. In addition, this information is valuable, it is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183, Florida Statutes.

Location of Proprietary Material

Costs found on:

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Lines 24, 26, 27, 28, 30, 32-36