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August 1, 1995

Ms. Blanca S. Bayo, Director Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re:

Docket No. 921074-TP
Petition for Expanded Interd

Petition for Expanded Interconnection for Alternate Access Vendors Within Local Exchange Company Central Offices by Intermedia Communications of Florida, Inc.

Dear Ms. Bayo:

SEC / A part of GTE Corporation

WAS ____

OTH ____

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Supplement to Motion for Extension of Time for Commission to Grant Confidential Classification in the above matter.

ACK		n the parties of record as evidenced by the Certificate of Service. as with regard to this matter, please contact the undersigned at
AFA /	(813) 228-3087.	is with regard to this matter, please contact the didensigned at
CMU Re	Very truly yours,	
EAG	Anthony P. Gillman	
LIN B	APG:tas	RECEIVED

EVED & FILED

DOCUMENT NUMBER-DATE

07259 AUG-18

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for Expanded Interconnection for Alternate Access Vendors Within Local Exchange Company Central Offices by Intermedia Communications of Florida, Inc.

Docket No. 921074-TP Filed: August 1, 1995

GTE FLORIDA INCORPORATED'S SUPPLEMENT TO MOTION FOR EXTENSION OF TIME FOR COMMISSION TO GRANT CONFIDENTIAL CLASSIFICATION

GTE Florida Incorporated (GTEFL) supplements its previously filed motion requesting the Commission to extend its confidential classification of certain documents produced by GTEFL in the above referenced docket. To supplement this motion, GTEFL states as follows:

- GTEFL filed its request for an extension of the confidential classification on July 3, 1995. However, the Commission Staff advised GTEFL that it needed to provide further support to justify the extension of time. The purpose of this supplement is to provide this additional support and justification.
- 2. The reasons relied upon by GTEFL in support of its original request for confidential treatment are still applicable today. In fact, it is more important today that such information remain protected from public disclosure. Competition for local exchange services will be opened on January 1, 1996 and 1+ presubscription will be available in 1996. These dramatic changes in the marketplace for local exchange service make GTEFL's business information more sensitive today than in 1993 when the material was first classified as confidential.

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FPSC-RECORDS/REPORTING

- 3. In this particular case, GTEFL produced a list of GTEFL's central offices in Florida, along with the number of access lines per office, and the number of private and special access lines per office. GTEFL was granted a confidential classification of the office-specific totals for the switched, special, and private lines categories. If GTEFL's competitors are able to acquire this information, they could easily identify those markets which are the most lucrative for the specific service listed. With this information, such competitors could tailor their marketing strategies in a manner to maximize their chances of success while posing the greatest loss for GTEFL. As such, disclosure of this information could result in competitive losses, to the detriment of the Company and its ratepayers.
- 4. Because of the opening of competition in the local exchange marketplace, public disclosure of confidential information identifying GTEFL's key markets could cause significant market damage to GTEFL. Such information, which is tied to very specific market areas and specific services, could still be used by competitors today. Although the numbers may have changed, the relative relationships between the different central offices and services have not. Those market areas identified as the most lucrative in 1993 are likely the most lucrative in 1995. Therefore, the fact that the information is dated does not lessen the potential for damage. Indeed, GTEFL contends that it could be harmed even more today because competition is much more prevalent today than it was in 1993.
- 5. As was true in 1993, in any competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which the information pertains. When knowledge is unfairly derived rather than gained through experience in

the marketplace, the competitive process is skewed, to the ultimate detriment of the consumer. Because this potential for harm continues to exist, GTEFL believes that an extension of the confidential classification is justified.

Respectfully submitted August 1, 1995.

Bv:

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Telephone: 813-228-3087

Attorneys for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Supplement to Motion for Extension of Time for Commission to Grant Confidential Classification in Docket No. 921074-TP were sent by U.S. mail on August 1, 1995, to the parties on the attached list.

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