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September 19, 1995

ORIGINAL FILE COPY
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IN REPLY REFER TO:

Tallahassee

BY HAND DELIVERY

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

Re: Number Portability; Docket No. 950737-TP

Dear Ms. Bayo:

Enclosed for filing in the above-styled docket are the original and fifteen (15) copies of United Telephone Company of Florida and Central Telephone Company of Florida's Request for Confidential Classification.

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

Thank you for your assistance in this matter.

Sincerely,

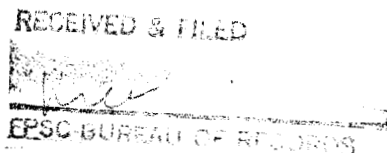

J. Jeffrey Wahlen

JJW/csu

cc: All Parties of Record

Enclosure

jjw\utd\950737.by0



DOCUMENT NUMBER-DATE

09223 SEP 19 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) DOCKET NO. 950737-TP
local telephone number portability) FILED: 9/19/95
solution to implement competition in)
local exchange telephone markets)
_____)

UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006, Florida Administrative Code, UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA (collectively, "Sprint United/Centel" or the "Companies") file this Request for Specified Confidential Classification for certain information provided to the Staff in this docket, and say:

1. This request covers the Companies' answers to Interrogatories Nos. 3. e, f and g of Staff's First Set of Interrogatories, which were filed on August 29, 1995, with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification. These answers consist of one page.

2. In accordance with FPSC Rule No. 25-22.006, F.A.C., a copy of the documents with the information the Companies consider to be proprietary has been filed under a separate cover as Exhibit "A" to this request and has the confidential information highlighted for identification purposes. In accordance with Rule 25-22.006, Florida Administrative Code, the Companies have appended

DOCUMENT NUMBER-DATE

09223 SEP 19 95

FPSC-RECORDS/REPORTING

hereto as Exhibit "B" one edited copy of the confidential answers with the confidential information blacked out ("redacted").

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on the Companies or its ratepayers will result from the disclosure of the information to the public. The Companies have identified this confidential information on a line-by-line basis, and have appended the required line-by-line identification and justifications hereto as Exhibit "C."

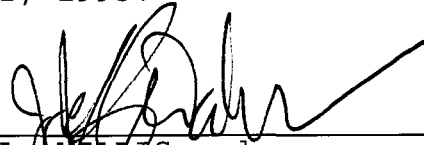
4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

7. For all the foregoing reasons, Sprint United/Centel respectfully urge the Commission to classify the above-described and discussed document as proprietary confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Chapter 119, Florida Statutes.

WHEREFORE, UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA move the Commission to enter an Order declaring their answers to Staff's First Set of Interrogatories, Nos. 3. e, f and g to be proprietary confidential business

information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 19th day of September, 1995.



LEE L. WILLIS and
J. JERRY WAHLEN
Macfarlane Ausley Ferguson
& McMullen
P. O. Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA AND 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 19th day of September, 1995, to the following:

Monica M. Barone *
Division of Legal Services
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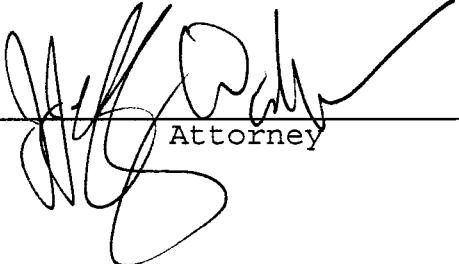
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Sprint Corporation
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Atlanta, GA 30339



Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary)
local telephone number portability)
solution to implement competition in)
local exchange telephone markets)
_____)

DOCKET NO. 950737-TP
FILED: 9/19/95

EXHIBIT "B" TO SPRINT UNITED/CENTEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION, DATED
September 19, 1995

Unedited Version of Interrogatory Answers
With
Confidential Information Redacted

MACFARLANE AUSLEY FERGUSON & MCMULLEN

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August 29, 1995

IN REPLY REFER TO:

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BY HAND DELIVERY

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

CONFIDENTIAL

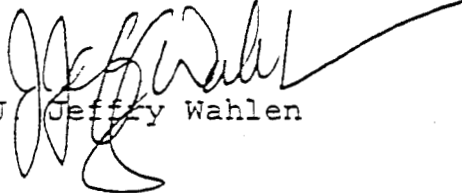
Re: Number Portability; Docket No. 950737-TP

CONFIDENTIAL DOCUMENT ATTACHED

Dear Ms. Bayo:

Enclosed with this letter is the confidential answer to Staff's First Set of Interrogatories, No. 3 e,f,g referred to in United Telephone Company of Florida and Central Telephone Company of Florida's Notice of Intent to Request Confidential Classification, which Notice was filed on this date with the Division of Records and Reporting. Please keep this document confidential pending receipt and action on the Companies' Request for Confidential Classification relating to this document.

Sincerely,


J Jeffrey Wahlen

JJW/csu

Enclosures

cc: All parties of record (w/o encl.)

utd\950737-b.noi

CONFIDENTIAL

United/Centel
Docket No. 950737-TP
Staff's 1st Set
Interrogatory No. 3.e,f,g
CONFIDENTIAL VERSION

3. List all possible technical alternatives to provide temporary number portability by January 1, 1996. For each alternative:
- (e) Identify any non-recurring costs and the reason for the costs.
 - (f) Identify any recurring costs and the reason for the costs.
 - (g) Identify the manner in which the costs set for in e. and f. were calculated.

Response:

- 1 (e) The non-recurring costs have not yet been identified.
- 2 (f) The total service long run incremental recurring cost for
3 providing interim number portability via remote call
4 forwarding is \$ [REDACTED] per line. This cost includes real-
5 time switch processor as well as dedicated memory.
- 6 The average recurring cost for providing interim number
7 portability via remote call forwarding is [REDACTED] per line.
8 This cost includes shared and common costs such as
9 software.
- 10 (g) The recurring costs were developed using the Bellcore
11 Switching Cost Information System (SCIS) to determine the
12 investment in memory and processor. The software expense
13 was included as a direct expense in the 1210 switches and
14 as a shared expense in the DMS and 5ESS switches.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) DOCKET NO. 950737-TP
local telephone number portability) FILED: 9/19/95
solution to implement competition in)
local exchange telephone markets)
_____)

EXHIBIT "C" TO SPRINT UNITED/CENTEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION, DATED
September 19, 1995

Line-by-line Identification and Justification

<u>Page</u>	<u>Column(s)</u>	<u>Line(s)</u>	<u>Justification</u>
1 of 1	data	4	Note 1
1 of 1	data	7	Note 1

Note 1: This interrogatory calls for cost data for the provision of temporary number portability via remote call forwarding. Under price regulation, which the Companies expect to elect, the prices for services like remote call forwarding will be set at market prices based on the competitive factors. Cost data like this, and especially incremental cost data, constitutes valuable financial data, the disclosure of which will harm the Companies by making this data available to competitors at no cost. Disclosure of this data would harm the Companies because similar data is not available from competitors at no or low cost and, therefore, disclosure puts the Companies at a competitive disadvantage. Entities operating in

a competitive, unregulated market guard their cost data jealously, and competitors must spend a considerable amount of money to estimate this type of data, if they can do so at all. Knowing with certainty a competitors estimate of its own incremental cost would allow a competitor to make informed decisions regarding whether to compete and/or what price to charge. If the Companies do not have this same data from its competitors, they will be unable to compete on a level playing field. The competitive disadvantage that would be created by public disclosure of this data would harm the Companies; therefore, the information should be deemed proprietary confidential business information.