

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

111 MADISON STREET, SUITE 2300
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

ORIGINAL
FILE COPY

400 CLEVELAND STREET
P. O. BOX 1669 (ZIP 34617)
CLEARWATER, FLORIDA 34615
(813) 441-8966 FAX (813) 442-8470

October 19, 1995

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.byo

Max

DOCUMENT NUMBER-DATE
10336 OCT 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: 10/19/95
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' revised answers to Interrogatories Nos. 3. e, f and g of Staff's First Set of Interrogatories, which were filed on October 2, 1995, and the Companies' answer to Staff's Second Set of Interrogatories, No. 10, filed on October 11, 1995. Both were filed with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification.

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

DOCUMENT NUMBER-DATE

10336 OCT 19 95

FPSC-RECORDS/REPORTING

25-22.006, Florida Administrative Code, the Companies have appended 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."

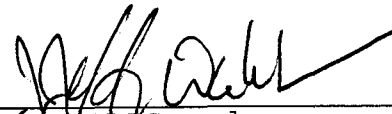
4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

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 revised answers to Staff's First Set of Interrogatories, Nos. 3. e, f and g and Staff's Second Set of

Interrogatories, No. 10, to be proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 19th day of October, 1995.



LEE L. WILLIS and
J. JEFFERY MAHLEN
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 October, 1995, to the following:

Monica M. Barone *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Laura Wilson
Charles F. Dudley
Florida Cable Telecomm.
310 North Monroe Street
Tallahassee, FL 32301

Peter M. Dunbar
Charles W. Murphy
Pennington Law Firm
Post Office Box 10095
Tallahassee, FL 32302

Anthony P. Gillman
Kimberly Caswell
GTE Florida Incorporated
Post Office Box 110, FLTC0007
Tampa, FL 33601-0110

Floyd Self
Messer Law Firm
Post Office Box 1876
Tallahassee, FL 32302

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs et al.
Post Office Drawer 1170
Tallahassee, FL 32302

J. Philip Carver
c/o Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Richard Rindler
Swidler & Berlin
3000 K St., NW #300
Washington, DC 20007

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, FL 32314

Michael W. Tye
AT&T
106 E. College Ave., Suite 1400
Tallahassee, FL 32301

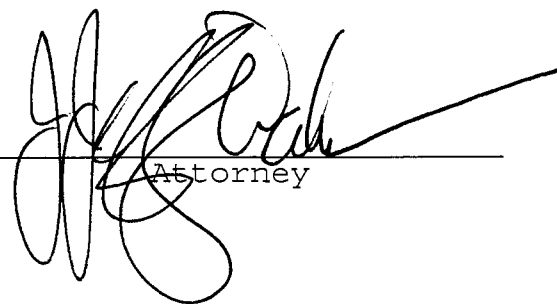
Charles J. Beck
Office of Public Counsel
111 W. Madison St., Room 812
Tallahassee, FL 32399-1400

Tony H. Key
Sprint Corporation
3100 Cumberland Circle
Atlanta, GA 30339

Jill Butler
Florida Regulatory Director
2773 Red Maple Ridge
Tallahassee, FL 32301

Timothy Devine
MFS Communications
250 Williams St., Suite 2200
Atlanta, GA 30303-1034

Sue E. Weiske
Time Warner Communications
160 Inverness Drive West
Englewood, CO 80112



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: 10/19/95

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

Unedited Version of Interrogatory Answers
With
Confidential Information Redacted

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 381 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

111 MADISON STREET, SUITE 2300
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

400 CLEVELAND STREET
P. O. BOX 1669 (ZIP 34617)
CLEARWATER, FLORIDA 34615
(813) 441-8966 FAX (813) 442-8470

October 2, 1995

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

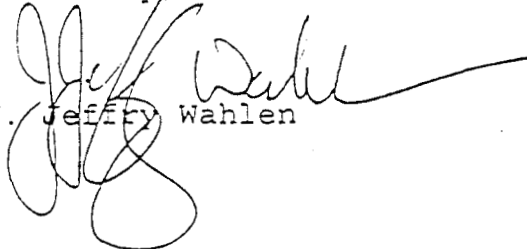
Re: Number Portability; Docket No. 950737-TP

CONFIDENTIAL DOCUMENT ATTACHED

Dear Ms. Bayo:

Enclosed with this letter is the revised 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
Revised 10/2/95

- 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)-(g)

3 The TSLRIC (Total Service Long Run Incremental Costs) for
4 interim number portability are as follows:

5 Interim Number Portability feature and
first call path

6 Additional Call Path

7 These costs projections include only the incremental
8 switch cost and the incremental transport cost.

9 The switch cost reflects a composite of the forward
10 looking switch technology (NorTel DMS-100 and AT&T 5ESS)
11 in S/UTF and S/CP. Memory, processor, line card, and
12 forward looking software costs were included as
13 appropriate. The costs were developed using the

1 proprietary Bellcore SCIS model - an automated
2 spreadsheet tool developed and maintained by Bellcore.
3 Engineering inputs representing the switches in our
4 Sprint network were used in the SCIS model.

4 The incremental transport cost reflects the additional
6 interoffice network components which will be in use as a
7 result of the forwarding of these calls.

8 The additional call path includes transport and switching
9 costs only.

10 The estimated average costs for interim number
11 portability are as follows:

12 Interim Number Portability feature and
first call path

13 Additional Call Path

14 Average costs, unlike TSLRIC, include shared fixed costs
15 such as operational software and sunk costs such as
16 switch startup.

17 Other shared costs which have not been included in either
18 the TSLRIC or Average costs include billing, collection,
19 directory listings and account maintenance.

CONFIDENTIAL

MACFARLANE AUSLEY FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

111 MADISON STREET, SUITE 2300
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(904) 224-9115 FAX (904) 222-7560

400 CLEVELAND STREET
P. O. BOX 1669 (ZIP 34617)
CLEARWATER, FLORIDA 34615
(813) 441-8966 FAX (813) 442-6470

October 11, 1995

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

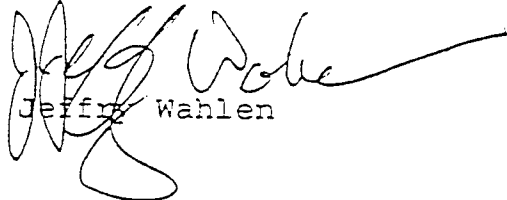
Re: Number Portability; Docket No. 950737-TP

CONFIDENTIAL DOCUMENT ATTACHED

Dear Ms. Bayo:

Enclosed with this letter is the confidential answer to Staff's Second Set of Interrogatories, No. 11 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

4066

SPRINT/UNITED TELEPHONE COMPANY OF FLORIDA
 SPRINT/CENTRAL TELEPHONE COMPANY OF FLORIDA

Remote Call Forward Feature Cost Support *

	A	B	C	D	E	F
	DMS100 TSLRIC	5ESS TSLRIC	Total TSLRIC	DM5100 AVERAGE	5ESS AVERAGE	Total Average

Cost Components

- 1 Switching
- 2 Depreciation
- 3 Maintenance
- 4 Taxes
- 5 Cost of Money
- 6 Administration

6 Software

7 Total Cost

8 Switch Factor

9 Factored Total Switching Cost

10 Transport

11 Total Remote Call Forward Feature Cost *

182

5066

* NOTE: Proprietary Information from Bellcore's SCIS Model

Confidential

SPRINT/UNITED TELEPHONE COMPANY OF FLORIDA
 SPRINT/CENTRAL TELEPHONE COMPANY OF FLORIDA

Additional Call Path Cost Support *

<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>	<u>F</u>
<u>DMS100</u>	<u>5ESS</u>	<u>Total</u>	<u>DMS100</u>	<u>5ESS</u>	<u>Total</u>
<u>TSLRIC</u>	<u>TSLRIC</u>	<u>TSLRIC</u>	<u>AVERAGE</u>	<u>AVERAGE</u>	<u>Average</u>

Cost Components

Switching

- 1 Depreciation
- 2 Maintenance
- 3 Taxes
- 4 Cost of Money
- 5 Administration

- 6 Software
- 7 Total Cost
- 8 Switch Factor

- 9 Factored Total Switching Cost
- 10 Transport
- 11 Total Additional Call Path Cost *

2
2
2

* NOTE: Proprietary Information from Bellcore's SCIS Model

6
6
6

Confidential

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) DOCKET NO. 950737-TP
local telephone number portability) FILED: 10/19/95
solution to implement competition in)
local exchange telephone markets)
_____)

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

Line-by-line Identification and Justification

<u>Page</u>	<u>Column(s)</u>	<u>Line(s)</u>	<u>Justification</u>
2 of 6	data	5,6	Note 1
3 of 6	data	12,13	Note 1
5 of 6	A-F	1-11	Note 1
6 of 6	A-F	1-11	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.