

952

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October 20, 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. 950 [REDACTED]


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 **Revised** Request for Confidential Classification. The reasons for the revisions are explained in the notes to the revised request.

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

- K _____
- A _____
- P _____
- IF _____
- JW _____
- IR _____
- AG _____
- EG 1
- IN h
- PC _____
- ICH _____
- SEC 1
- NAS _____

JJW/csuo
cc: All Parties of Record
Enclosure
jjw\utd\950737.byu

10366-95

DOCUMENT NO./OFF-DATE
10366 OCT 20 95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) DOCKET NO. 950737-TP
local telephone number portability) FILED: 10/20/95
solution to implement competition in)
local exchange telephone markets)
_____)

UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA'S
REVISED 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 **Revised**¹ 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. 11, filed on October 11, 1995. Both were filed with the Division of

¹The purpose of this revision is to correct a typographical error in the Request for Confidential Classification filed on behalf of the Companies on October 19, 1995. In this version, which is being filed within the 21 days provided in the rule, all references to the answer to Staff's Second Set of Interrogatories, No. 10 has been corrected to refer to the documents actually submitted to the Commission with the request, i.e., the answer to Staff's Second Set of Interrogatories, No. 11. There are no other differences between the original request and this revised request.

DOCUMENT NUMBER-DATE

10356 OCT 20 95

FPSC-RECORDS/REPORTING

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 request² and has the confidential information highlighted for identification purposes. In accordance with Rule 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

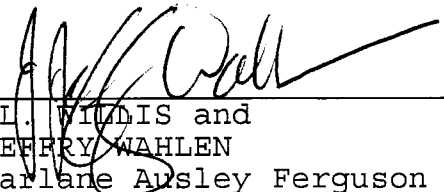
²As noted in note one, this is a revised request. Insofar as there were no changes to the Exhibit "A" submitted on October 19, 1995, the Companies have not resubmitted Exhibit "A." This revised request simply serves to correct a discrepancy between the Exhibit "A" submitted on October 19, 1995 and the original request for confidential classification.

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. 11, to be proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 20th day of October, 1995.



LEE I. WILLIS and
J. JEFFRY 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 20th 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

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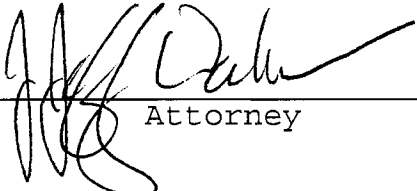
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Sue E. Weiske
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160 Inverness Drive West
Englewood, CO 80112



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: 10/20/95

EXHIBIT "B" TO SPRINT UNITED/CENDEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION, DATED
October 20, 1995

Unedited Version of Interrogatory Answers
With
Confidential Information Redacted

MACFARLANE AUSLEY FERGUSON & McMULLEN

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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.)

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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
6 first call path

7 Additional Call Path

8 These costs projections include only the incremental
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

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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.)

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

Remote Call Forward Feature Cost Support *

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

Cost Components

- 1 Switching
- 2 Depreciation
- 3 Maintenance
- 4 Taxes
- 5 Cost of Money
- 6 Administration
- 7 Software
- 8 Total Cost
- 9 Switch Factor
- 10 Factored Total Switching Cost
- 11 Transport
- 12 Total Remote Call Forward Feature Cost *

182

4066

* 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*

A- DM3100 ISLRIC	B SESS ISLRIC	C Total ISLRIC	D DM5100 AVERAGE	E SESS AVERAGE	F Total Average
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Cost Components

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

- F Software
- 7 Total Cost
- 8 Switch Factor

9 Factored Total Switching Cost

2062

10 Transport

11 Total Additional Call Path Cost*

6266

* NOTE: Proprietary Information from Bellcore's SCIS Model

Confidential

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into temporary) DOCKET NO. 950737-TP
local telephone number portability) FILED: 10/20/95
solution to implement competition in)
local exchange telephone markets)
_____)

EXHIBIT "C" TO SPRINT UNITED/CENTEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION, DATED
October 20, 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.