



GTE Telephone Operations

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CONFIDENTIAL
FILE COPY

November 15, 1995

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

Re: Docket No. 921074-TP
In the Matter of the Petition of Intermedia Communications of Florida, Inc. for
Expanded Interconnection for AAVs Within LEC Central Offices

Dear Ms. Bayo:

Enclosed in the manila envelope are new pages intended to replace existing pages supporting GTE Florida Incorporated's zone density pricing tariff submitted in this docket on August 31, 1995. Both the original and replacement pages are confidential. GTEFL submitted the original pages (numbered 14 through 16 of 41) under a Request for Confidential Classification and Motion for Permanent Protective Order. A copy of that Request, dated August 31, 1995, is enclosed for your convenience.

Please replace the original, confidential pages 14 through 16 of 41 of GTEFL's zone density support filing with the new, confidential pages 14 through 16 of 41, then send back the original pages to me. The old and new sets of pages are identical, except for the confidential numbers. No new redacted pages have been sent because they will remain exactly the same as before. The August 31 Request for Confidential Classification applies to the replacement pages.

A part of GTE Corporation

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

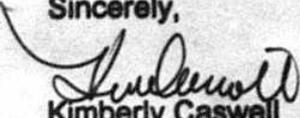
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FPSC-RECORDS/REPORTING

Ms. Blanca Bayo
November 15, 1995
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The changes in the numbers on these pages have become necessary because of conversations between GTEFL's Chuck Bailey and Commission Staff member MaryRose Sirianni. If you have any questions, please contact me.

Sincerely,



Kimberly Caswell

KC:tas
Enclosures

c: Walter D'Haeseleer (wo/e)

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August 31, 1995

Re: Docket No. 921074-TP
In the Matter of the Petition of Intermedia Communications of Florida,
Inc. For Expanded Interconnection for AAVs within LEC Central Offices

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Permanent Protective Order for certain information contained in the Company's Zone Density Pricing tariff filed in this docket by order of the Commission. GTEFL believes the recent revisions to Chapter 364, Florida Statutes, render this Request unnecessary to protect the confidentiality of the information at issue. (See ch. 364.183.) GTEFL is filing this Request only because of the Commission Legal Staff's preference to keep existing confidentiality procedures in place until the Commission can conclude a rulemaking to formally establish new procedures.

Sincerely,


Kimberly Caswell

KC:tas
Enclosures

c: Rob Vandiver, FPSC Staff (wo/e)

A part of GTE Corporation

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of INTERMEDIA)
COMMUNICATIONS OF FLORIDA, INC.)
for expanded interconnection for)
AAVs within LEC central offices)

Docket No. 921074-TP
Filed: August 31, 1995

**GTE FLORIDA'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND MOTION FOR PERMANENT PROTECTIVE ORDER**

By Order numbers PSC-95-0034-FOF-TP and PSC-95-0680-FOF-TP, GTE Florida Incorporated (GTEFL) was directed to file zone density tariffs and supporting information for restructured local transport rates. With this Request, GTEFL seeks confidential classification and a permanent protective order for certain information in the tariff filing, also submitted today.

While a ruling on this request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). Highlighted, unredacted copies of the confidential material are attached to only the original of this Request as Exhibit A. Redacted copies of these items are attached to this Request as Exhibit B. Exhibit C is a line-by-line justification of confidentiality.

All of the information for which GTEFL seeks confidential treatment fits within Florida Statutes section 364.183(3)(e), which defines the term, "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information." GTEFL closely guards this information, disclosing it to only those with a need to know it.

As reflected in the line-by-line justification, the confidential information in this filing falls within two general categories: (1) a map showing GTEFL's high-volume customer locations; (2) detailed cost support for each element in GTEFL's zone tariff rates.

The competitively sensitive nature of the map accompanying the tariff filing is self-evident. The map shows the placement of two alternate access vendor (AAV) networks in the Tampa Bay area, along with an overlay of the location of GTEFL's largest customers there. The confidential portion of the exhibit is GTEFL's customer locations. Public disclosure of this information would provide GTEFL's competitors with a plan for marketing their own services. They could discern where GTEFL's most lucrative customers are and try to convince them to leave GTEFL. Comprehensive knowledge of the location of these potential customers could also help competitors devise the most effective network expansion strategies.

The other type of information for which GTEFL seeks protection is cost studies underlying its proposed zone transport rates. Figures given include long-run incremental cost of all components of the transport service; investment, expenses, and total cost by USOA account number; special and dedicated transport cost breakdown, with weighting factors; costs per loop length; respective costs per DS-3, DS-1, and DS-0; pricing components and calculations; and incremental monthly costs of assets and monthly expenses for transport elements. This detailed cost information, coupled with public data about GTEFL's prices, would permit competitors to discern GTEFL's profit margins and the lowest prices it could charge for its services. Public disclosure of this information would thus enable GTEFL's competitors to devise marketing, entry, and expansion strategies to

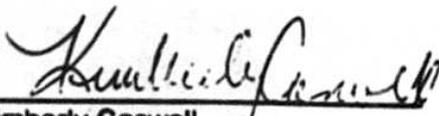
ensure their success in competing with GTEFL. Competitors could structure their operations to most efficiently compete with GTEFL and undercut its prices. In addition, disclosure of investment information about specific equipment costs could weaken GTEFL's ability to obtain favorable prices from its vendors in the future.

The transport facilities addressed in this Request and associated tariff filing are subject to ever-increasing competitive pressures. Numerous AAVs are have been certified in Florida, some of them competing directly with GTEFL. The nature and number of competitors will increase exponentially with the new legislation allowing local competition in Florida. In this environment, the smallest competitive advantage could be decisive, and all competitors have a patent interest in gaining any such advantage. Unauthorized disclosure of any information about a company could be used to its detriment, in ways that probably cannot even be anticipated.

When competitive advantages are legitimately obtained through trial and error, the marketplace works as it should. However, if useful competitive information is instead disclosed publicly in a regulatory proceeding, the benefits derived from this information are unfair and will hinder efficient market operation, to the ultimate detriment of the consumer.

For all these reasons, GTEFL asks the Commission to grant this Request for confidential treatment of the specified information and to issue a permanent protective order with regard to these data.

Respectfully submitted on August 31, 1995.

By: 

Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-228-3094

Attorney for GTE Florida Incorporated

Pricing & Tariff Support

FLORIDA

A

B

C

D

DEDICATED ACCESS LINE - VOICE GRADE - 2 WIRE

1
2
3
4
5
6
7
8
9
10

Network Access Channel Basic Level *
Network Access Channel Connection Basic Analog Level

Total

DEDICATED TRANSPORT - VOICE GRADE - 2 WIRE

Dedicated Transport Facility - per Mile

Transport Termination - per End

Special Transport - per Mile **

* The Network Access Basic Level cost was weighted based on a percent
high, percent medium density and percent low density line distribution
less a monthly credit of \$1.60 for a service installation non-recurring charge (NRC)

** Assumes 10 miles and 2 terminations

Pricing & Tariff Support

FLORIDA

A

B

C

D

DEDICATED ACCESS LINE - VOICE GRADE - 4 WIRE

1

Network Access Channel Basic Level *

3

Network Access Channel Connection Basic Analog Level

Total

DEDICATED TRANSPORT - VOICE GRADE - 4 WIRE

4

Dedicated Transport Facility - per Mile

5

Transport Termination - per End

6

Special Transport - per Mile **

7

* The Network Access Basic Level cost was weighted based on a percent
 high, percent medium density and percent low density line distribution
 less a monthly credit of \$1.60 for a service installation non-recurring charge (NRC)

8

9

10

** Assumes 10 miles and 2 terminations

GTE FLORIDA
2 AND 4-WIRE VOICE GRADE ENTRANCE FACILITY
NETWORK ACCESS CHANNEL BASIC LEVEL
LRIC DEVELOPMENT

A B C D E

Line Density Distribution	Percent Distribution	2-Wire Voice Grade LRIC	Weighted 2-Wire Voice Grade LRIC	4-Wire Voice Grade LRIC	Weighted 4-Wire Voice Grade LRIC
High Medium Low					
Network Access Channel Basic Level [A]					
Monthly Credit for NRC (\$104.91) Per Unit Amortized at 9.89% for 95 mos. [B]			\$1.60		\$1.60
Network Access Channel Basic Level less Monthly Credit for NRC [A - B]					

Note: The Non-Recurring Charge of \$104.91 is the Service Installation Charge Per Voice Grade Entrance Facility

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DEDICATED ACCESS LINE - VOICE GRADE - 2 WIRE

\$13.58	Network Access Channel Basic Level *
<u>\$0.15</u>	Network Access Channel Connection Basic Analog Level
\$13.73	Total

DEDICATED TRANSPORT - VOICE GRADE - 2 WIRE

\$0.02	Dedicated Transport Facility - per Mile
\$8.81	Transport Termination - per End
\$1.78	Special Transport - per Mile **

* The Network Access Basic Level cost was weighted based on a 20.41 percent high, 76.09 percent medium density and 3.50 percent low density line distribution less a monthly credit of \$1.60 for a service installation non-recurring charge (NRC)

** Assumes 10 miles and 2 terminations

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DEDICATED ACCESS LINE - VOICE GRADE - 4 WIRE

\$18.95	Network Access Channel Basic Level *
<u>\$0.20</u>	Network Access Channel Connection Basic Analog Level
\$19.15	Total

DEDICATED TRANSPORT - VOICE GRADE - 4 WIRE

\$0.02	Dedicated Transport Facility - per Mile
\$8.81	Transport Termination - per End
\$1.78	Special Transport - per Mile **

* The Network Access Basic Level cost was weighted based on a 20.41 percent high, 76.09 percent medium density and 3.50 percent low density line distribution less a monthly credit of \$1.60 for a service installation non-recurring charge (NRC)

** Assumes 10 miles and 2 terminations

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GTE FLORIDA
2 AND 4-WIRE VOICE GRADE ENTRANCE FACILITY
NETWORK ACCESS CHANNEL BASIC LEVEL
LRIC DEVELOPMENT

Line Density Distribution	Percent Distribution	2-Wire Voice Grade LRIC	Weighted 2-Wire Voice Grade LRIC	4-Wire Voice Grade LRIC	Weighted 4-Wire Voice Grade LRIC
High	20.41%	\$12.41	\$2.53	\$17.13	\$3.50
Medium	76.09%	\$15.00	\$12.02	\$21.22	\$16.15
Low	3.50%	\$18.00	\$0.63	\$25.84	\$0.90
Network Access Channel Basic Level [A]			\$15.18		\$20.55
Monthly Credit for NRC (\$104.91) Per Unit Amortized at 9.89% for 95 mos. [B]			\$1.60		\$1.60
Network Access Channel Basic Level less Monthly Credit for NRC [A - B]			\$13.58		\$18.95

Note: The Non-Recurring Charge of \$104.91 is the Service Installation Charge Per Voice Grade Entrance Facility

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