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November 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: Docket Nos. 921074-TP, 930955-TL, 940014-TL,
931196-TL and 940190-TL--In re: Expended
Interconnection and local Transport Restructure

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 concerning cost data supporting the zone density tariff filed in the above-captioned docket.

The original version contains one copy of Exhibit "A," which contains a highlighted version of the information for which confidential classification is being requested. The original and all 15 copies include Exhibit "B," which is a redacted version of the information for which confidential classification is being requested. We request that the Commission take steps to ensure that the Exhibit "A" included in the original be kept confidential pending a decision on this request and thereafter when the request has been granted.

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

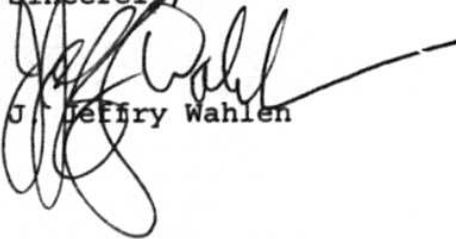
RECEIVED & FILED
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11614 NOV 20 95
FPSC-RECORDS/REPORTING

Ms. Blanca S. Bayo
November 20, 1995
Page 2

Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey Wahlen", with a long horizontal flourish extending to the right.

J. Jeffrey Wahlen

JJW/csu

Enclosures

utd\921074.byo

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) Docket No. 921074-TP
and Local Transport Restructure.) Docket No. 930955-TL
) Docket No. 940014-TL
) Docket No. 940020-TL
) Docket No. 931196-TL
) Docket No. 940190-TL
)
)
) Filed: November 20, 1995
_____)

**REQUEST FOR CONFIDENTIAL CLASSIFICATION
BY UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA**

United Telephone Company of Florida and Central Telephone Company of Florida (United/Centel) pursuant to the provisions of Florida Public Service Commission (FPSC) Rule 25-22.006, Florida Administrative Code, request that an order be entered declaring that the information described below is confidential information as that term is defined in Rule 25-22.006(1)(a), F.A.C., and as such is exempt from Section 119.07, Florida Statutes (1993). In support of this Request, United/Centel state that:

1. This Request covers cost data of United/Centel which supports the zone density tariff required to be filed by FPSC Order No. PSC-94-153-NOR-TL, issued November 7, 1994 in the above-captioned dockets.
2. Rule 25-22.006(4), F.A.C., requires that confidential information be highlighted, and identified with the page and line at which the confidential material is found, and that the utility correlate the page and line identified as confidential with the

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

specific justification proffered in support of the confidential classification of such material.

3. Copies of the documents identified in paragraph 1 above are enclosed with the confidential information highlighted as required by the Rule. The documents with the confidential material highlighted are attached to the original only of this Request as Exhibit "A". Copies of the documents containing the confidential material with the confidential material blocked out with an opaque marker or other masking device are attached to this Request as Exhibit "B". Copies of this Request served on the parties in this matter do not have a copy of Exhibit "A" attached, but do have a copy of Exhibit "B" attached.

4. A listing of the pages and lines at which the confidential materials can be found is attached to this Request as Exhibit "C". A listing correlating the pages and lines of the confidential material with the specific justification proffered in support of the confidential classification of the material is attached to this Request as Exhibit "D".

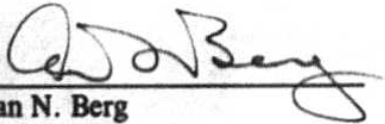
5. The material for which confidential classification is sought is intended to be and is treated by United/Centel as confidential and has not been disclosed without being subject to an agreement to maintain its confidential status.

6. The confidential material consists of cost data for zone density pricing for United/Centel, and will remain confidential through the entire course of this docket and thereafter.

7. Upon conclusion of this docket, United/Centel request that the confidential information described above be returned to United/Centel.

Wherefore, United Telephone Company of Florida and Central Telephone Company of Florida request that an order be entered declaring the information described herein as falling within the specified confidential classification.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alan N. Berg", written over a horizontal line.

Alan N. Berg
Senior Attorney
Central Telephone Company of Florida
P.O. Box 165000
Altamonte Springs, Florida 32716-5000
(407) 889-6018

EXHIBIT "B"

**Docket Nos. 921074-TP, 930955-TL, 940014-TL, 940020-TL, 931196-TL and
940190-TL-- In re: Expanded Interconnection and Local Transport Restructure.**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION BY
UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA**

Copy of Documents with Confidential Information Marked Out

Local Transport Restructure Zone Density

A <u>Proposed Rate Elements</u>	B <u>Incremental Cost</u>	C <u>Zone 1 Rate</u>	D <u>Zone 2 Rate</u>	E <u>Zone 3 Rate</u>
1 Entr. Facility - DS1	[REDACTED]	\$189.00	\$210.00	\$220.50
2 Entr. Facility - DS3 (0 Miles)	[REDACTED]	\$832.00	\$924.00	\$970.00
3 Entr. Facility - DS3 (1-3 Miles)	[REDACTED]	\$1,463.00	\$1,626.00	\$1,707.00
4 Entr. Facility - DS3 (3+ Miles)	[REDACTED]	\$2,577.00	\$2,863.00	\$3,006.00
5 Direct Trunked Fixed - DS1	[REDACTED]	\$83.70	\$93.00	\$97.65
6 Direct Trunked Per Mile - DS1	[REDACTED]	\$18.00	\$20.00	\$21.00
7 Direct Trunked Fixed - DS3	[REDACTED]	\$460.00	\$472.00	\$496.00
8 Direct Trunked Per Mile - DS3	[REDACTED]	\$219.00	\$243.00	\$255.00
9 Tandem Switched Termination	[REDACTED]	\$0.000251	\$0.000279	\$0.000293
10 Tandem Switched Facility	[REDACTED]	\$0.000058	\$0.000064	\$0.000067
11 Tandem Switching (1st Minute)	[REDACTED]	\$0.000808	\$0.000898	\$0.000943
12 Tandem Switching (Additional Minute)	[REDACTED]	\$0.000808	\$0.000898	\$0.000943
13 Multiplexing - DS1 to Voice	[REDACTED]	\$270.00	\$300.00	\$315.00
14 Multiplexing - DS3 to DS1	[REDACTED]	\$540.00	\$600.00	\$630.00

Private Line Zone Density

	A	B	C	D	E
		Incremental Cost	Zone 1 Rate	Zone 2 Rate	Zone 3 Rate
1	Local Channel	[REDACTED]	\$101.50	\$112.75	\$118.40
2	24-48 Months	[REDACTED]	\$99.50	\$110.50	\$116.05
3	49-72 Months	[REDACTED]	\$98.05	\$108.90	\$114.40
4	73-96 Months	[REDACTED]	\$96.60	\$107.30	\$112.70
	<i>Interoffice</i>				
5	Fixed	[REDACTED]	\$46.35	\$51.50	\$54.10
6	24-48 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
7	49-72 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
8	73-96 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
	<i>Per Mile</i>				
9	Per Mile (1-8)	[REDACTED]	\$21.50	\$23.85	\$25.05
10	Per Mile (9-25)	[REDACTED]	\$20.20	\$22.40	\$23.55
11	Per Mile (25+)	[REDACTED]	\$18.85	\$20.90	\$21.95
	<i>24-48 Months</i>				
12	Per Mile (1-8)	[REDACTED]	\$17.55	\$19.45	\$20.45
13	Per Mile (9-25)	[REDACTED]	\$16.20	\$17.95	\$18.90
14	Per Mile (25+)	[REDACTED]	\$14.85	\$16.45	\$17.30
	<i>49-72 Months</i>				
15	Per Mile (1-8)	[REDACTED]	\$16.15	\$17.90	\$18.85
16	Per Mile (9-25)	[REDACTED]	\$14.85	\$16.45	\$17.30
17	Per Mile (25+)	[REDACTED]	\$13.50	\$14.95	\$15.75
	<i>73-96 Months</i>				
18	Per Mile (1-8)	[REDACTED]	\$14.85	\$16.45	\$17.30
19	Per Mile (9-25)	[REDACTED]	\$13.50	\$14.95	\$15.75
20	Per Mile (25+)	[REDACTED]	\$12.15	\$13.45	\$14.15

Special Access Zone Density

	A	B	C	D	E
DS1		<u>Incremental Cost</u>	<u>Zone 1 Rate</u>	<u>Zone 2 Rate</u>	<u>Zone 3 Rate</u>
1	<i>Local Channel</i>		\$101.50	\$112.75	\$118.40
2	24-48 Months		\$99.50	\$110.50	\$116.05
3	49-72 Months		\$98.05	\$108.90	\$114.40
4	73-96 Months		\$96.60	\$107.30	\$112.70
	<i>Interoffice</i>				
5	Fixed		\$51.85	\$51.50	\$54.10
6	24-48 Months		\$43.10	\$47.85	\$50.25
7	49-72 Months		\$43.10	\$47.85	\$50.25
8	73-96 Months		\$43.10	\$47.85	\$50.25
	<i>Per Mile</i>				
9	Per Mile (1-8)		\$21.50	\$23.85	\$25.05
10	Per Mile (9-25)		\$20.20	\$22.40	\$23.55
11	Per Mile (25+)		\$18.85	\$20.90	\$21.95
	<i>24-48 Months</i>				
12	Per Mile (1-8)		\$17.55	\$19.45	\$20.45
13	Per Mile (9-25)		\$16.20	\$17.95	\$18.90
14	Per Mile (25+)		\$14.85	\$16.45	\$17.30
	<i>49-72 Months</i>				
15	Per Mile (1-8)		\$16.15	\$17.90	\$18.85
16	Per Mile (9-25)		\$14.85	\$16.45	\$17.30
17	Per Mile (25+)		\$13.50	\$14.95	\$15.75
	<i>73-96 Months</i>				
18	Per Mile (1-8)		\$14.85	\$16.45	\$17.30
19	Per Mile (9-25)		\$13.50	\$14.95	\$15.75
20	Per Mile (25+)		\$12.15	\$13.45	\$14.15

Mobile Interconnection Zone Density

	A	B	C	D	E
DS1					
		<u>Incremental Cost</u>	<u>Zone 1</u>	<u>Zone 2</u>	<u>Zone 3</u>
1 Local Channel		[REDACTED]	\$101.50	\$112.75	\$118.40
2 Interoffice Channel (1st Mile or fraction thereof)			\$66.55	\$73.90	\$77.65
3 Interoffice Channel (Each addtn'l of fraction thereof)			\$20.20	\$22.40	\$23.55
		<u>Incremental Cost</u>			
4 Interoffice Channel (Fixed)		[REDACTED]			
5 Interoffice Channel (Per Mile)		[REDACTED]			

Local Transport Restructure Zone Density

	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>	<u>E</u>
	<u>Proposed Rate Elements</u>	<u>Incremental Cost</u>	<u>Zone 1 Rate</u>	<u>Zone 2 Rate</u>	<u>Zone 3 Rate</u>
1	Entr. Facility - DS1		\$189.00	\$210.00	\$220.50
2	Entr. Facility - DS3 (0 Miles)		\$832.00	\$924.00	\$970.00
3	Entr. Facility - DS3 (1-3 Miles)		\$1,463.00	\$1,626.00	\$1,707.00
4	Entr. Facility - DS3 (3+ Miles)		\$2,577.00	\$2,863.00	\$3,006.00
5	Direct Trunked Fixed - DS1		\$83.70	\$93.00	\$97.65
6	Direct Trunked Per Mile - DS1		\$18.00	\$20.00	\$21.00
7	Direct Trunked Fixed - DS3		\$460.00	\$472.00	\$496.00
8	Direct Trunked Per Mile - DS3		\$219.00	\$243.00	\$255.00
9	Tandem Switched Termination		\$0.000251	\$0.000279	\$0.000293
10	Tandem Switched Facility		\$0.000058	\$0.000064	\$0.000067
11	Tandem Switching (1st Minute)		\$0.000808	\$0.000898	\$0.000943
12	Tandem Switching (Additional Minute)		\$0.000808	\$0.000898	\$0.000943
13	Multiplexing - DS1 to Voice		\$270.00	\$300.00	\$315.00
14	Multiplexing - DS3 to DS1		\$540.00	\$600.00	\$630.00

Private Line Zone Density

	A	B Incremental Cost	C Zone 1 Rate	D Zone 2 Rate	E Zone 3 Rate
1	Local Channel		\$101.50	\$112.75	\$118.40
2	24-48 Months		\$99.50	\$110.50	\$116.05
3	49-72 Months		\$98.05	\$108.90	\$114.40
4	73-96 Months		\$96.60	\$107.30	\$112.70
<i>Interoffice</i>					
5	Fixed		\$46.35	\$51.50	\$54.10
6	24-48 Months		\$43.10	\$47.85	\$50.25
7	49-72 Months		\$43.10	\$47.85	\$50.25
8	73-96 Months		\$43.10	\$47.85	\$50.25
<i>Per Mile</i>					
9	Per Mile (1-8)		\$21.50	\$23.85	\$25.05
10	Per Mile (9-25)		\$20.20	\$22.40	\$23.55
11	Per Mile (25+)		\$18.85	\$20.90	\$21.95
<i>24-48 Months</i>					
12	Per Mile (1-8)		\$17.55	\$19.45	\$20.45
13	Per Mile (9-25)		\$16.20	\$17.95	\$18.90
14	Per Mile (25+)		\$14.85	\$16.45	\$17.30
<i>49-72 Months</i>					
15	Per Mile (1-8)		\$16.15	\$17.90	\$18.85
16	Per Mile (9-25)		\$14.85	\$16.45	\$17.30
17	Per Mile (25+)		\$13.50	\$14.95	\$15.75
<i>73-96 Months</i>					
18	Per Mile (1-8)		\$14.85	\$16.45	\$17.30
19	Per Mile (9-25)		\$13.50	\$14.95	\$15.75
20	Per Mile (25+)		\$12.15	\$13.45	\$14.15

Special Access Zone Density

DS1	A	B Incremental Cost	C Zone 1 Rate	D Zone 2 Rate	E Zone 3 Rate
1	<i>Local Channel</i>	[REDACTED]	\$101.50	\$112.75	\$118.40
2	24-48 Months	[REDACTED]	\$99.50	\$110.50	\$116.05
3	49-72 Months	[REDACTED]	\$98.05	\$108.90	\$114.40
4	73-96 Months	[REDACTED]	\$96.60	\$107.30	\$112.70
<i>Interoffice</i>					
5	<i>Fixed</i>	[REDACTED]	\$46.35	\$51.50	\$54.10
6	24-48 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
7	49-72 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
8	73-96 Months	[REDACTED]	\$43.10	\$47.85	\$50.25
<i>Per Mile</i>					
9	Per Mile (1-8)	[REDACTED]	\$21.50	\$23.85	\$25.05
10	Per Mile (9-25)	[REDACTED]	\$20.20	\$22.40	\$23.55
11	Per Mile (25+)	[REDACTED]	\$18.85	\$20.90	\$21.95
24-48 Months					
12	Per Mile (1-8)	[REDACTED]	\$17.55	\$19.45	\$20.45
13	Per Mile (9-25)	[REDACTED]	\$16.20	\$17.95	\$18.90
14	Per Mile (25+)	[REDACTED]	\$14.85	\$16.45	\$17.30
49-72 Months					
15	Per Mile (1-8)	[REDACTED]	\$16.15	\$17.90	\$18.85
16	Per Mile (9-25)	[REDACTED]	\$14.85	\$16.45	\$17.30
17	Per Mile (25+)	[REDACTED]	\$13.50	\$14.95	\$15.75
73-96 Months					
18	Per Mile (1-8)	[REDACTED]	\$14.85	\$16.45	\$17.30
19	Per Mile (9-25)	[REDACTED]	\$13.50	\$14.95	\$15.75
20	Per Mile (25+)	[REDACTED]	\$12.15	\$13.45	\$14.15

Mobile Interconnection Zone Density

DS1	A	B	C	D	E
		<u>Incremental Cost</u>	<u>Zone 1 Rate</u>	<u>Zone 2 Rate</u>	<u>Zone 3 Rate</u>
1	Local Channel	[REDACTED]	\$101.50	\$112.75	\$118.40
2	Interoffice Channel (Fixed)	[REDACTED]	\$46.35	\$51.50	\$54.10
	Interoffice Channel (Per Mile)				
3	1-8 Miles	[REDACTED]	\$21.50	\$23.85	\$25.05
4	9-25 Miles	[REDACTED]	\$20.20	\$22.40	\$23.55
5	Over 25 Miles	[REDACTED]	\$18.85	\$20.90	\$21.95

EXHIBIT "C"

Docket Nos. 921074-TP, 930955-TL, 940014-TL, 940020-TL, 931196-TL and 940190-TL-- In re: Expanded Interconnection and Local Transport Restructure.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION BY
UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA**

Description of Confidential Information

The following information has be identified as confidential.

United Zone Density Cost Study

Attachment 2, Page 1 of 4, Column B, Lines 1-14, Incremental Costs
Attachment 2, Page 2 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 3 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 4 of 4, Column B, Lines 1, 4 and 5, Incremental Costs

Centel Zone Density Cost Study

Attachment 2, Page 1 of 4, Column B, Lines 1-14, Incremental Costs
Attachment 2, Page 2 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 3 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 4 of 4, Column B, Lines 1, 4 and 5, Incremental Costs

EXHIBIT "D"

Docket Nos. 921074-TP, 930955-TL, 940014-TL, 940020-TL, 931196-TL and 940190-TL-- In re: Expanded Interconnection and Local Transport Restructure.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION BY
UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA**

Specific Justification to Support Confidential Classification

The following justification is offered for the information listed below:

United Zone Density Cost Study

Attachment 2, Page 1 of 4, Column B, Lines 1-14, Incremental Costs
Attachment 2, Page 2 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 3 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 4 of 4, Column B, Lines 1, 4 and 5, Incremental Costs

Centel Zone Density Cost Study

Attachment 2, Page 1 of 4, Column B, Lines 1-14, Incremental Costs
Attachment 2, Page 2 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 3 of 4, Column B, Lines 1-20, Incremental Costs
Attachment 2, Page 4 of 4, Column B, Lines 1, 4 and 5, Incremental Costs

The information claimed as confidential contained in the above-referenced page and lines consists of incremental costs for zone density pricing for local transport, private line, special access and mobile interconnection. All of these services except mobile interconnection are currently or soon will be subject to competition at various locations in the United/Centel service territory. United has recently been the subject of arbitrage of its cellular interconnection rates in the Orlando area and no longer

terminates much of the cellular traffic in its Orlando area service territory. It is apparent from this loss of service that cellular interconnection is the subject of competition in some areas. Competition for all of these services will increase as more competitors enter the local service market under the recently enacted legislation at the State level and the pending legislation at the Federal level. Competitors are present and waiting to provide all of these services.

Section 364.183(3)(e), Florida Statutes (1993), describes 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 the information."

The incremental costing information provided on local transport pricing for local transport, private line, special access and mobile interconnection, is information relating to the competitive interest of United/Centel. Disclosure of the information would allow other providers of services to determine the minimum price at which United/Centel could sell the services and enable other providers of the services a competitive advantage in pricing their service. Such an advantage would impair United/Centel's ability to compete in the market for the services listed, and give its competitors an unfair competitive advantage. The revealing of the competitive information would lessen United/Centel's ability to compete in the marketplace and deprive consumers of services of a viable competitor for the service.

MEMORANDUM

November 20, 1995

TO: DIVISION OF APPEALS
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS
 DIVISION OF COMMUNICATIONS
 DIVISION OF ELECTRIC AND GAS
 DIVISION OF RESEARCH
 DIVISION OF WATER AND WASTEWATER
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (WILLIAMS)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO. 11618-95

DESCRIPTION: Cost data supporting some density tariff

SOURCE: UNITED/CENDEL

DOCKET NO.: 921074-TP, 930955-TL, 931196-TL AND 940190-TL

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.

The utility has provided enough details to perform a reasoned analysis of its request.