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December 12, 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: Resolution of Petition to Establish Non
Discriminatory Rates, Terms, and Conditions
for Interconnection Involving Local Exchange
Companies and Alternative Local Exchange
Companies pursuant to Section 364.162,
Florida Statutes - Docket No. 950985-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.

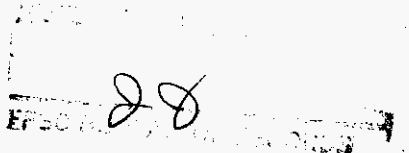
Sincerely,



J. Jeffrey Wahlen

JJW/csu
Enclosures
cc: All parties of record

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DOCUMENT NUMBER-DATE

12474 DEC 12 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to)
Establish Non Discriminatory Rates,)
Terms, and Conditions for Inter-)
connection Involving Local Exchange)
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.162, Florida Statutes)

DOCKET NO. 950985-TP

Filed: 12/12/95

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 No. 1 of Staff's First Set of Interrogatories. This answer was filed with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification on November 21, 1995.

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

12474 DEC 12 8 601

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, No. 1, to be proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 12th day of December, 1995.



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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 12th day of December, 1995, to the following:

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Attorney

jjw\utd\950985.rcc

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of Petition to) DOCKET NO. 950985-TP
Establish Non Discriminatory Rates,)
Terms, and Conditions for Inter-)
connection Involving Local Exchange))
Companies and Alternative Local)
Exchange Companies pursuant to)
Section 364.162, Florida Statutes)
_____)

EXHIBIT "B" TO SPRINT UNITED/CENDEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Unedited Version of Interrogatory Answers
With
Confidential Information Redacted

STAFF'S FIRST SET OF INTERROGATORIES (NO. 1)
TO UNITED TELEPHONE COMPANY OF FLORIDA AND
CENTRAL TELEPHONE COMPANY OF FLORIDA
DOCKET NO. 950985-TP

CONFIDENTIAL

1. Please provide the current long-run incremental cost of originating or terminating a call for local interconnection purposes on a per-minute basis.

1 The current long-run incremental cost of originating or
2 terminating a call for local interconnection purposes on
3 a per-minute basis is as follows:

4 Interoffice -
5 Local Tandem -

6 Note: Assumes all intra-company traffic.
7 Interoffice assumes one class 5 office.
8 Local Tandem assumes two Class 5 offices, one of which serves as a local tandem.

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_____)

EXHIBIT "C" TO SPRINT UNITED/CENDEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Identification and Justification

<u>Page</u>	<u>Column(s)</u>	<u>Line(s)</u>	<u>Justification</u>
1	data	4,5	Note 1

Note 1: This interrogatory calls for cost data for local interconnection. Under price regulation, which the Companies expect to elect, the prices for services like local interconnection will be set via negotiation at market prices based on 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 and potential interconnectors at no cost. Disclosure of this data would harm the Companies by making sensitive cost data available to potential interconnectors during the negotiation process. Therefore, disclosure puts the Companies at a competitive disadvantage. Entities operating in a competitive, unregulated market guard their cost data jealously, and competitors and potential interconnectors must spend a considerable amount of money to estimate this type of data, if they can do so at all. Knowing

the Companies' estimate of its own incremental cost would allow a competitor to make informed negotiating decisions as well as decisions about whether to compete and/or what price to charge for certain services. The 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.