

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
Resolution of petition(s) to establish)
unbundled services, network features,)
functions or capabilities, and local loops)
pursuant to section 364.161, Florida)
Statutes)
_____)

Docket No. 950984-TP
Filed: February 7, 1996

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FILE COPY**

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

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTEFL) seeks confidential classification and a permanent protective order for certain information in the Direct Testimony of Dennis B. Trimble in this proceeding. 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 the line-by-line justification of confidentiality.

All of the information for which GTEFL seeks confidential treatment fits within Florida Statutes section 364.188(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 the information." The information covered in this filing reveals GTEFL's per-line costs associated with the unbundled elements of GTEFL's business and residential basic local exchange loops. GTEFL also seeks confidential treatment of the per-line contribution numbers which, when combined with public revenue information, would enable calculation of GTEFL's cost data.

GTEFL closely guards its cost information from public disclosure, and it is typically granted confidential treatment by the Commission. Knowledge of GTEFL's costs of providing particular services or elements, particularly when coupled with public information about GTEFL's rates, will allow its competitors to discern GTEFL's relative strengths and weaknesses in its cost structure. With this information,

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competitors can devise the most effective marketing, entry, and or expansion strategies to ensure their success in competing with GTEFL, without the usual marketplace trial and error.

In addition to cost and associated information, GTEFL seeks confidential protection for its projections of the effects of loop unbundling on GTEFL's revenues, along with the associated retail contribution and unbundled loop contribution figures. These data will again enable GTEFL's competitors to determine where GTEFL may be most vulnerable and allow them to formulate their business plans accordingly.

In a competitive market, any information gained about a competitor can be used to the detriment of that party, often in ways that are unanticipated. These concerns have become increasingly more acute for GTEFL as the revisions to Chapter 364 have opened all of GTEFL's lines of business to competition. Indeed, this proceeding is motivated by GTEFL's competitors' efforts to receive the most advantageous treatment possible in entering new businesses. It would be patently unfair as well as inimical to efficient competition if these competitors were permitted to gain a competitive advantage through disclosure of GTEFL's sensitive information in a regulatory proceeding.

For these reasons, GTEFL respectfully asks the Commission to grant this Request to issue a permanent protective order for the information detailed in Exhibit C.

Respectfully submitted on February 7, 1996.

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| <u>Page</u> | <u>Line</u> | <u>Column</u> | <u>Reason</u> |
|-------------|-------------|---------------|--|
| 7 | 19,22 | n/a | Contribution from business customers |
| 8 | 4 | n/a | Contribution from residential customers |
| 13 | 1,4,5 | n/a | Revenue impact of unbundling |
| Table 1 | 1 | C | Business local exchange line TSLRIC |
| Table 1 | 3 | C | Business toll per-line TSLRIC |
| Table 1 | 4 | C | Business vertical services per-line TSLRIC |
| Table 1 | 7 | C | Business other per-line TSLRIC |
| Table 1 | 8 | C | Business switched access per-line TSLRIC |
| Table 1 | 9 | C | Business total TSLRIC |
| Table 1 | 1 | D | Business local exchange line contribution |
| Table 1 | 3 | D | Business toll per-line contribution |
| Table 1 | 4 | D | Business vertical services per-line contribution |
| Table 1 | 7 | D | Business other per-line contribution |
| Table 1 | 8 | D | Business switched access per-line contribution |
| Table 1 | 9 | D | Business total per-line contribution |
| Table 2 | 1 | C | Residential local exchange line TSLRIC |
| Table 2 | 3 | C | Residential toll per-line TSLRIC |
| Table 2 | 4 | C | Residential vertical services per-line TSLRIC |

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|-------------|-------------|---------------|--|
| Table 2 | 7 | C | Residential other per-line TSLRIC |
| Table 2 | 8 | C | Residential switched access per-line TSLRIC |
| Table 2 | 9 | C | Residential total TSLRIC |
| Table 2 | 1 | D | Residential local exchange line contribution |
| Table 2 | 3 | D | Residential toll per-line contribution |
| Table 2 | 4 | D | Residential vertical services per-line contribution |
| Table 2 | 7 | D | Residential other per-line contribution |
| Table 2 | 8 | D | Residential switched access per-line contribution |
| Table 2 | 9 | D | Residential total per-line contribution |
| Table 3 | 1 | B | TSLRIC, business unbundled loop |
| Table 3 | 2 | B | TSLRIC, residential unbundled loop |
| Table 3 | 3 | B | TSLRIC for unbundled loop, bus. and res. Average |
| Table 3 | 1 | C | TSLRIC wholesale costs, business unbundled loop |
| Table 3 | 2 | C | TSLRIC wholesale costs, residential unbundled loop |
| Table 3 | 3 | C | TSLRIC wholesale costs for unbundled loop, bus. and res. average |
| Table 3 | 1 | D | Lost contribution to margin, business |

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|-------------|-------------|---------------|---|
| Table 3 | 2 | D | Lost contribution to margin, residence |
| Table 3 | 3 | D | Lost contribution to margin, avg. bus. and res. |
| Table 4 | 1 | C | Business retail contribution |
| Table 4 | 2 | C | Residential retail contribution |
| Table 4 | 1 | D | Unbundled loop contribution, bus. |
| Table 4 | 2 | D | Unbundled loop contribution, res. |
| Table 4 | 1 | E | Annual loss, business |
| Table 4 | 2 | E | Annual loss, residential |
| Table 4 | 3 | E | Total annual loss |