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March 19, 1996

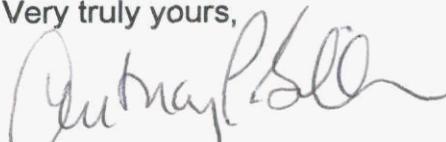
Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 950985-TP
Resolution of petition(s) to establish nondiscriminatory rates, terms and conditions for interconnection involving local exchange companies and alternative local exchange companies pursuant to Section 364.162, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Protective Order in the above matter. One copy of the confidential documents and two redacted copies are also enclosed. Service has been made as indicated on the Certificate of Service. If there are any questions with regard to this matter, please contact me at 813-228-3087.

Very truly yours,


Anthony P. Gillman

APG:tas
Enclosures

A part of GTE Corporation

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EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
03242 MAR 19 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Resolution of petition(s) to)
establish nondiscriminatory rates, terms,)
and conditions for interconnection)
involving local exchange companies)
and alternative local exchange companies)
pursuant to Section 364.162, F.S.)
_____)

Docket No. 950985-TP
Filed: March 19, 1996

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

GTE Florida Incorporated (GTEFL) seeks confidential classification and a permanent protective order for certain information submitted in its response to items 5, 6, and 7 of the Commission Staff's Second Request for Production of Documents in this matter. In support of this request, GTEFL states as follows:

1. On March 1, 1996, GTEFL filed its notice of intent to seek confidential classification of certain information submitted in its response to items 5, 6, and 7 of the Commission Staff's Second Request for Production of Documents. GTEFL filed additional documents as a supplement to Request for Production No. 5 on March 12, 1996 and filed a notice of intent to seek confidential classification of these additional documents on the same day.

2. All of this information falls within Florida Statutes §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 that information." The documents in question contain competitively sensitive information regarding the cost of GTEFL to provide switching and

transport functions. If these competitors are able to acquire detailed and sensitive costing information regarding GTEFL, competitors could more easily develop entry and marketing strategies to ensure success in competing with GTEFL. Clearly, these competitors would be more adept at pricing their own services if they possess details about GTEFL's cost structure. This affords GTEFL's competitors an unfair advantage while severely jeopardizing GTEFL's competitive position. In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the consumer.

3. Furthermore, because the information would be disclosed to competitors through a regulatory proceeding--rather than through legitimate market trial and error processes--the marketplace will be skewed, to the ultimate detriment of the consumer. The information at issue would be valuable to potential competitors in formulating marketing strategies to assure successful competition against GTEFL. Disclosure of this information would provide such competitors an unfair competitive advantage.

4. While a ruling on this request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes, Section 119.01(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, labeled Exhibit A, are submitted in a separate envelope accompanying only the original of this Request.

Redacted copies of these items are attached to this Request as Exhibit B. Exhibit C is a line-by-line description of the confidential information at issue.

Respectfully submitted on March 19, 1996.

By: 

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Attorneys for GTE Florida Incorporated

Exhibit C

Page	Line	Column	Justification
1000001	3-23	B-G	These columns present switching and transport costs relating to certain central offices. With this costing information, competitors could target these central offices and would have inside information on how to price their services.
1000002	1-18, 20	A-D	These columns depict confidential information regarding the long run incremental cost of switching. Knowing how much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000003	1-18, 20	A-D	These columns depict confidential information regarding the long run incremental cost of switching. Knowing how much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000004	1-18, 20	A-D	These columns depict confidential information regarding the long run incremental cost of switching. Knowing how much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000005	1-19	B-E	These columns contain volume sensitive and insensitive long run incremental costs pertaining to GTEFL's switched access. Knowing how much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000006	1-19	B-E	These columns contain volume sensitive and insensitive long run incremental costs pertaining to GTEFL's switched access. Knowing how

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Page	Line	Column	Justification
			much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000007	1-19	B-E	These columns contain volume sensitive and insensitive long run incremental costs pertaining to GTEFL's switched access. Knowing how much it costs for GTEFL to switch calls, other carriers would be in a better position to price their own local services in direct competition with GTEFL.
1000008	1-13	B-I	These columns contain the equipment investment and annual operating expenses relating to the call set-up function. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000009	1-13	B-I	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000010	1-13	B-I	These columns contain the equipment investment and annual operating expenses relating to incoming call set-ups. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.

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Page	Line	Column	Justification
1000011	1-13	B-I	These columns contain the equipment investment and annual operating expenses relating to incoming calls. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000012	1-13	B-I	These columns contain the equipment investment and annual operating expenses relating to switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000013	1-8,10-12	B	This column shows the long run incremental costs of local transport for various services offered by GTEFL. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000014	1-9,12,15	B	This column shows the long run incremental costs of local transport for various services offered by GTEFL, as well as confidential assumptions regarding average call duration. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000015	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's

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Page	Line	Column	Justification
			competitors in a better position to price their own local services in direct competition with GTEFL.
1000016	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000017	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000018	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000019	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000020	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to GTEFL's switching functionalities.

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Page	Line	Column	Justification
			Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000021	1	A	This column contains the long run incremental cost of DS1 to Voice Grade Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000022	1-20	B	This column contains the long run incremental cost of DS1 to Voice Grade Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000023	2-52	B-G	These columns contain the equipment investment and annual operating expenses relating to DS1 to Voice Grade Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000024	1-43	B-G	These columns contain the equipment investment and annual operating expenses relating to DS1 to Voice Grade Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000025	1	A	This column contains the long run incremental cost of DS3 to DS1 Multiplexing. Having detailed information regarding GTEFL's

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Page	Line	Column	Justification
			underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000026	1-20	B	This column contains the long run incremental cost of DS1 to Voice Grade Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local services in direct competition with GTEFL.
1000027	1-52	B-G	These columns contain the equipment investment and annual operating expenses relating to DS3 to DS1 Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000028	1-43	B-G	These columns contain the equipment investment and annual operating expenses relating to DS3 to DS1 Multiplexing. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000084	2-8, 11-17, 20-22	E	This column shows the long run incremental costs of local transport for various services offered by GTEFL. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.

Exhibit C

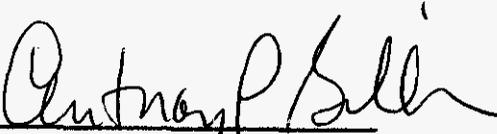
Page	Line	Column	Justification
1000085	1,2,3,5,6, 7,8,9	A,B	These columns contain the long run incremental costs of local transport for a DS1 dedicated access line and DS1 dedicated transport. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000086	1-20	B	This column shows the long run incremental costs of local transport for a DS1 special access line (150 Mb/s 28 DS1). Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000087	2-52	B-G	These columns contain the equipment investment and annual operating expenses relating to a DS1 special access lines. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000088	1-20	B	This column shows the long run incremental costs of local transport for a DS1 special access line (6.3 Mb/s). Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000089	2-52	B-G	These columns contain the equipment investment and annual operating expenses relating to a DS1 special access line. Having detailed information regarding GTEFL's

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Page	Line	Column	Justification
			underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000090	1-30	B-M	These columns contain the equipment investment and annual operating expenses relating to a DS1 special access line. Having detailed information regarding GTEFL's underlying cost structure would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.
1000091	3-6, 9-12, 15-18	B-I	These columns show the long run incremental costs of local transport. Having detailed information regarding GTEFL's transport costs would put GTEFL's competitors in a better position to price their own local transport services in direct competition with GTEFL.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Protective Order in Docket No. 950985-TP were sent via U.S. mail on March 19, 1996 to the parties on the attached list.


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