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August 23, 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. 950984-TP  
Resolution of petition(s) to establish nondiscriminatory rates, terms and conditions for resale involving local exchange companies and alternative local exchange companies pursuant to Section 364.161, 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. 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 813-228-3094.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP F \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Phase \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH all to Matilda \_\_\_\_\_

Very truly yours,

Kimberly Caswell

KC:tas  
Enclosures

A part of GTE Corporation

DOCUMENT NUMBER - DATE  
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FPSC-RECORDS/REPORTING

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10 1996

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Resolution of petition(s) to establish )  
nondiscriminatory rates, terms and conditions for )  
resale involving local exchange companies and )  
alternative local exchange companies pursuant to )  
Section 364.161, Florida Statutes )

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Docket No. 950984-TP  
Filed: August 23, 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 Commission Order number PSC-96-0811-FOF-TP.

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 to GTEFL of providing a DS-1 unbundled loop, as well as the percentage distribution of DS-1s provided by small and large systems. If competitors are able to acquire detailed and sensitive costing and service distribution information regarding GTEFL, they 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

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advantage skews the operation of the market, to the ultimate detriment of the consumer.

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.

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. A line-by-line justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on August 23, 1996.

By:

  
\_\_\_\_\_  
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Attorneys for GTE Florida Incorporated

**ANALYSIS OF GTE FLORIDA TSLRIC DS-1 COSTS  
PER ORDER NUMBER PSC-96-0811-FOF-TP.**

The order for Docket No. 950984-TP, page 13 states that GTE "shall explain why its TSLRIC estimate is higher than its proposed rate, current tariffed Special Access charge, for the unbundled DS-1 loop."

GTE filed a TSLRIC cost study for a DS-1 unbundled loop that would be appropriate for the provisioning of a DS-1 unbundled loop service to an ALEC on behalf of an end user. The TSLRIC costs provided are appropriate costs when an ALEC or any customer purchases DS1 unbundled services in a quantity that dictates the use of a small Fiber Optic system.

The current GTE DS-1 Special Access rates are applicable to DS-1 service provided to Interexchange companies, large demand end-users, ALECs and other end-users. In order to determine if the current tariff rates are appropriate, a TSLRIC study was performed based on the technology requirements required to support the representative customer mix.

To develop a TSLRIC study that is representative of the approved tariff service, a review of the GTE Florida CNAS data base was performed to determine appropriate fiber optic systems sizes. The predominate fiber systems used by GTE in Florida were identified and a sample was used to developed a weighted system percentage. The results of the TSLRIC study are shown on page 2.

The rates developed for Entrance Facilities in the Local Transport tariffs were based on cost studies that focused on a different mixture of appropriate fiber optics systems. As such, the results of those cost studies would not be an appropriate measurement of costs for an unbundled DS-1 loop that would use a small FO systems.

**ANALYSIS OF DS-1 SPECIAL ACCESS CHANNEL**

A                      B                      C

1 Based on a review of the GTE Florida CNAS data base, there are two predominate  
 2 systems used to provide service for DS-1 Network Access Channel.  
 3 To develop an estimated TSLRIC costs for the access channel, a DS1  
 4 cost was developed based on the weightings of DS-1s used for network  
 5 access.

6		% of total	
7		<u>distribution</u>	
8			percent of DS-1 provided by small system
9			percent of DS-1 provided by large system

10 TSLRIC based on small Fiber Optic System Size

11		Average	
12	Vol Sensitiv	Volume Insensitive	
13	LRIC Costs	Costs	
14			Network Access Channel DS-1 Level
15			Network Access Channel Connection
16			

17 TSLRIC based on larger Fiber Optic System Size

18		Average	
19	Vol Sensitiv	Volume Insensitive	
20	LRIC Costs	Costs	
21			Network Access Channel DS-1 Level
22			Network Access Channel Connection
23			

24 TSLRIC based on weighted FO System Sizes

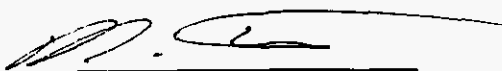
25		Average	
26	Vol Sensitiv	Volume Insensitive	
27	LRIC Costs	Costs	
28			
29			
30			
31			
32			Network Access Channel DS-1 Level
33			Network Access Channel Connection
34			

EXHIBIT C

<u>Page</u>	<u>Line</u>	<u>Column</u>	<u>Reason</u>
2	8, 9 28, 29	B	Percentage distributions of DS1s provided by small and large systems, respectively
2	14-16	A	Volume-sensitive LRICs based on small fiber optic system
2	14-16	C	Volume-insensitive costs based on small fiber optic system
2	21-23	A	Volume-sensitive LRICs based on large fiber optic system
2	21-23	C	Volume-insensitive costs based on large fiber optic system
2	28-34	A	Volume-sensitive LRICs based on weighted fiber optic system sizes
2	28-34	C	Volume-insensitive costs based on weighted fiber optic system sizes

**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. 950984-TP were sent via U.S. mail on August 23, 1996 to the parties on the attached list.



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