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October 24, 1996

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-8850

RE: Docket No. 960910-TP
In re: Recommendation to require applicable LECs to reduce their
switched access charges by five percent annually, pursuant to Section
364.163, F.S.

Dear Ms. Bayo:

Enclosed for filing on behalf of AT&T Communications of the Southern
States, Inc. in the above referenced docket are the original and 15 copies of AT&T's
request for Confidential Classification of Proprietary Data. Also enclosed is a
separate envelope containing the confidential version of the exhibits.

By copy of this letter, this document has been provided to the parties on the
attached service list.

Very truly yours,

Marsha E. Rule
Marsha E. Rule

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

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[Signature]
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DOCUMENT NUMBER-DATE
11348 OCT 24 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Recommendation to require)	Docket No. 960910-TP
applicable LECs to reduce their)	
switched access charges by five percent)	
annually, pursuant to Section)	Filed: 10/24/96
364.163(6), F.S.)	
_____)		

**AT&T OF THE SOUTHERN STATES, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF PROPRIETARY DATA**

AT&T Communications of the Southern States, Inc. ("AT&T" hereby requests confidential classification of certain data required by the Commission in Order No. PSC-96-1265-FOF-TP, issued in this docket on October 8, 1996. The data constitutes proprietary confidential business information of AT&T pursuant to Section 364.183, Florida Statutes, and should therefore be afforded confidential classification pursuant to Rule 25-22.006, Florida Administrative Code. In support, AT&T shows as follows:

I. Summary of Confidential Information

The information for which confidentiality is sought is as follows: Order No. PSC-96-1265-FOF-TP, issued October 8, 1996, in the above-referenced docket, requires applicable local exchange companies to reduce switched access charges effective October 1, 1996. This order also requires interexchange carriers to reduce customer long distance rates effective October 1, 1996, and to calculate the estimated savings to its Florida intrastate operations. In response to that ruling, enclosed is a one-page calculation of AT&T's percentage reduction in switched access charges, intrastate minutes of use, change in IXC rate, and rate reduction. Some of the

data contained in this attachment constitute proprietary confidential business information pursuant to Section 364.183, Florida Statutes, and consequently, AT&T hereby requests that said information be afforded confidential treatment. The information for which confidentiality is sought is found in the attachment at Lines 8 through 25 in Columns B and C, labeled "Study Period # Intrastate Minutes of Use (M)" and "Change in IXC Rates".

II. Justification for Confidential Classification

In accordance with Sections 350.121 and 364.183, Florida Statutes, as well as Rule 25-22.006, Florida Administrative Code, the previously described information should be classified as confidential information and afforded appropriate protection from public disclosure. The material relates to the competitive activities of AT&T and provides specific information, not otherwise available to AT&T's competitors, regarding AT&T's Florida intrastate traffic volumes.

(1) Column B, Lines 8 - 25:

Lines 8 through 25 of Column B, labeled "Study Period # Intrastate Minutes of Use (M)", show the number of intrastate switched conversation minutes of use carried by AT&T in 1996, listed separately for each type of long distance service shown. These minutes relate to a period during which the Florida intrastate interexchange market has been intensely competitive, with numerous new firms entering the market, with existing firms increasing their marketing efforts in an attempt to attract customers away from AT&T, and with a multitude of new service offerings and marketing schemes being introduced. Public disclosure of the data contained lines 8 through 25 of this column would provide AT&T's competitors with a road map to determine the success or failure of their efforts in a given year. Using such information, AT&T's competitors could then develop future marketing plans based on the successes or failures of the past. Such

information, however, would not be available to AT&T with respect to the past activities of its competitors. Consequently, public disclosure of AT&T's information would put AT&T's competitors at an unfair competitive advantage in the intrastate interexchange market and would unfairly disadvantage AT&T in its efforts to compete with other carriers in Florida.

The above referenced information constitutes proprietary confidential business information which must be protected from public disclosure pursuant to Section 365.183, Florida Statutes. Such information constitutes "trade secrets" pursuant to Section 364.183(3)(a), Florida Statutes, and also constitutes information "relating to competitive interests, the disclosure of which would impair the competitive business" of AT&T pursuant to Section 364.183(3)(e), Florida Statutes. This information is intended to be and is treated by AT&T as being private and confidential in nature and is not disclosed to persons outside of AT&T except under limited circumstances in which the confidentiality of the information can be protected. AT&T derives independent economic value from such information not generally being known, and AT&T's competitors could obtain economic value from the disclosure and use of such information.

(2) Column C, Lines 8 - 25:

Lines 8 through 25 of Column C, labeled "Change in IXC Rates", show how AT&T has allocated the rate reduction ordered by the Commission in Order No. PSC-96-1265-FOF-TP. This information, when used as the denominator of the figures in Lines 8-25 of Column D (labeled "\$M) Study Period Rate Reduction"), would yield the figures shown in Lines 8-25 of Column B. Therefore, these figures would allow rapid calculation of the number of intrastate switched conversation minutes of use carried by AT&T in 1996. For the reasons stated above, public disclosure of the data contained lines 8 through 25 of this column would provide AT&T's

competitors with a road map to determine the success or failure of their efforts in a given year. Using such information, AT&T's competitors could then develop future marketing plans based on the successes or failures of the past. Such information, however, would not be available to AT&T with respect to the past activities of its competitors. Consequently, public disclosure of AT&T's information would put AT&T's competitors at an unfair competitive advantage in the intrastate interexchange market and would unfairly disadvantage AT&T in its efforts to compete with other carriers in Florida.

The above referenced information constitutes proprietary confidential business information which must be protected from public disclosure pursuant to Section 365.183, Florida Statutes. Such information constitutes "trade secrets" pursuant to Section 364.183(3)(a), Florida Statutes, and also constitutes information "relating to competitive interests, the disclosure of which would impair the competitive business" of AT&T pursuant to Section 364.183(3)(e), Florida Statutes. This information is intended to be and is treated by AT&T as being private and confidential in nature and is not disclosed to persons outside of AT&T except under limited circumstances in which the confidentiality of the information can be protected. AT&T derives independent economic value from such information not generally being known, and AT&T's competitors could obtain economic value from the disclosure and use of such information.

III. Duration of Confidentiality

Because of the dynamic nature of competition in the State of Florida, AT&T is unable to provide a date by which the material contained in this response would no longer be proprietary and confidential.

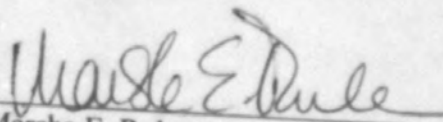
IV. Return of Information

AT&T requests that this confidential information be returned to it after the Commission has verified compliance with Order No. PSC-96-1265-FOF-TP.

V. Conclusion

In accordance with the provisions of Rule 25-22.006, Florida Administrative Code, the requested information has been provided in two forms. Attachment A is a copy of the information on which the proprietary information has been highlighted and is submitted in a separate sealed envelope labeled "CONFIDENTIAL". This version, which contains the complete information, should be classified as confidential information for the reasons set forth above. Attachment B is a redacted version which contains the information in non-proprietary form. Copies of this version have been served on the parties of record to this docket.

Respectfully submitted this 24rd day of October, 1996.



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101 N. Monroe St.
Suite 700
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(904) 425-6365

ATTORNEY FOR AT&T COMMUNICATIONS
OF THE SOUTHERN STATES, INC.

Name of IXC: AT&T

Study Period: 1/96 - 12/96

<u>LEC</u>	<u>% Reduction</u>	<u>(\$M)</u> <u>Study Period</u> <u>Sw Access Charges</u>	<u>(\$M)</u> <u>Study Period</u> <u>Sw Access Savings</u>
1 BellSouth	-17.6%	\$146.342	-\$25.762
2 GTE	-5.0%	\$89.603	-\$4.469
3 Sprint United/Centel	-5.1%	\$104.208	-\$5.297
4 ICOs	-0.6%	\$10.847	-\$0.065
5 Study Period Total Savings			-\$35.593
6 Intrastate Long Distance Billable Revenue for Study Period			\$727.909
7 Required % Reduction in IXC's FL Intrastate Long Distance Rates=			-4.9%

<u>A</u> <u>Service</u>	<u>B</u> <u>Study Period</u> <u># Intrastate</u> <u>Minutes of Use (M)</u>	<u>C</u> <u>Change in IXC Rate</u>	<u>D</u> <u>(\$M)</u> <u>Study Period</u> <u>Rate Reduction</u>
8 Residence LD			-\$17.784
9 Business LD			-\$0.681
10 Customer Dialed Card			-\$0.237
11 800 READYLINE			-\$0.933
12 800 Masterline			-\$0.090
13 Customnet (Plan A)			-\$1.603
14 Customnet Option S			-\$0.527
15 Megacom 800			-\$4.531
16 Uniplan-Switched Inbound			-\$0.806
17 Uniplan-Dedicated Inbound			-\$1.980
18 Mlutiquest			-\$0.035
19 Customnet-Type 1			-\$2.657
20 Megacom WATS			-\$0.377
21 Uniplan-Switched Outbound			-\$0.804
22 Uniplan-Dedicated Outbound			-\$0.948
23 DNS			-\$0.092
24 SDN-A			-\$0.757
25 SDN-B			-\$1.029
26 TOTAL REDUCTION			-\$35.870

CERTIFICATE OF SERVICE

DOCKET NO. 960910-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand-delivery to the following parties of record this 24th day of October, 1996:

Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301

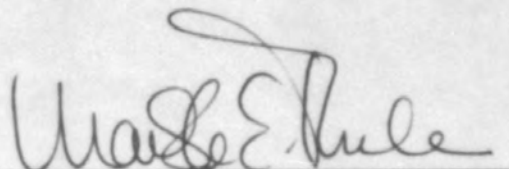
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Atlanta, GA 30375

Ben Poag, Director
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P. O. Box 2214 M/C 2565
Tallahassee, FL 32316-2214


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