



GTE Telephone Operations

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October 31, 1996

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

Re: Docket Nos. 960847-TP and 960980-TP
Petitions by AT&T Communications of the Southern States, Inc.,
MCI Telecommunications Corporation and MCI Metro Access
Transmission Services, Inc. for arbitration of certain terms and
conditions of a proposed agreement with GTE Florida Incorporated
concerning interconnection and resale under the Telecommunications
Act of 1996

Dear Ms. Bayo:

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

Enclosed are an original and fifteen copies of a Request for Confidential Classification and Motion for Protective Order in connection with the Late-Filed Deposition Exhibits of Dennis Trimble and Bert Steele in the above matters.

Due to the voluminous nature of this filing, GTEFL is submitting only two redacted copies of the documents. If additional copies are needed, please let me know.



A part of GTE Corporation

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Ms. Blanca S. Bayo
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Service has been made as indicated on the Certificate of Service. Please call me if you have any questions regarding this matter.

Very truly yours,


Anthony P. Gillman

APG:tas
Enclosures

1996
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T Communications)
of the Southern States, Inc. for arbitration)
of certain terms and conditions of a proposed)
agreement with GTE Florida Incorporated)
concerning interconnection and resale under)
the Telecommunications Act of 1996)
_____)

Docket No. 960847-TP
Filed: October 31, 1996

In re: Petition by MCI Telecommunications)
Corporation and MCI Metro Access)
Transmission Services, Inc. for arbitration of)
certain terms and conditions of a proposed)
agreement with GTE Florida Incorporated)
concerning interconnection and resale under)
the Telecommunications Act of 1996)
_____)

Docket No. 960980-TP

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 contained in the Late-Filed Deposition Exhibits of Dennis Trimble and Bert Steele in this proceeding.

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 supplement GTEFL's comprehensive cost studies for unbundled network elements and other components. If competitors are able to acquire this detailed and sensitive costing information regarding GTEFL, they could more easily develop entry and marketing strategies to ensure success

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in competing with GTEFL. These competitors would be more adept at pricing their own services if they possess details about GTEFL's cost structure. This affords them 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. 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. This effect is particularly troublesome in the context of this docket, which is intended to set rules for encouraging rational and efficient competition, rather than providing any entity a competitive advantage.

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). One highlighted, unredacted copy of the confidential material, labeled Exhibit A, is contained in the binder attached to the original of this Request. Redacted copies of these items are attached to this Request as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on October 31, 1996.

By: 

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Attorneys for GTE Florida Incorporated

Exhibit C

Late-Filed Exhibit No. 1, 3, and 5. These pages set forth the determination of the Annual Operating Expense Factors as described in GTE's TSLRIC Workpapers binder on Page A-3, which was previously filed with the Commission under confidential cover in this docket. These factors disclose information and assumptions about GTE's network operations that would help competitors tailor their own networks to better compete with GTE.

Late-Filed Exhibit No. 2. These pages explain how the Central Office Land and Building Factor and use on page A-95 of GTE's TSLRIC Workpapers were developed. Disclosure of this information about GTE's network will help competitors tailor their own operation to better compete with GTE.

Late-Filed Exhibit No. 4. These pages demonstrate the Interim Number Portability model run without the GTD-5 technology data. GTE advocates the inclusion of the GTD-5 technology in its TELRIC/TSLRIC studies. Disclosure of GTE's costs for providing number portability will give its competitors--which potentially include ILECs an unfair advantage in designing their own networks and services.

Late-Filed Exhibit No. 6. This exhibit provides cross-references and formula listings in the spreadsheet template provided in GTE's original TSLRIC Workpapers previously filed. This exhibit deals with determination of end office switching costs. The pages include cost components for entrance facilities, direct trunked transport, tandem switching, and end office switching. This information, if disclosed to competitors, would give them an unfair advantage in structuring their operations and their entry and marketing strategies to ensure their success in competing with GTE. This is particularly true in the transport area, which is already very competitive.

Late-Filed Exhibit No. 7. These pages provide cross-references and formula listings in the spreadsheet template provided in GTE's original TSLRIC Workpapers filing. Exhibit 7 explains the determination of the DS1 and DS3 costs, including cost components for entrance facilities, direct trunked transport, tandem switching and end office switching. This information, if disclosed to competitors, would give them an unfair advantage in structuring their operations and their entry and marketing strategies to ensure their success in competing with GTE. This is particularly true in the transport area, which is already very competitive.

Late-Filed Exhibit No. 8. Exhibit 8 provides a summary of the corrections to the TELRIC for GTE's two-wire unbundled loop element. Three changes are incorporated into this cost study from the original one: (a) the impact of correcting the utilization factor for pair-gain technology; (b) the impact of incorporating economic depreciation rates; and (c) the impact of adjusting customer operations expenses by removing billing, service order and retail costs. The data is broken down by relative frequency of particular density categories. In addition the pricing and tariff support for particular unbundled elements is provided. Basic

network function costs are provided. Competitors could use this information to discern how to most effectively compete with GTE. They could devise successful entry and pricing strategies without the usual market disadvantage. The fact that GTE cannot obtain this sort of information from its competitors through the regulatory process exacerbates the unfairness of allowing its public disclosure.

Late-Filed Exhibit No. 9. This exhibit provides explanation of the determination of two and four-wire costs. Costs components include entrance facilities, direct trunked transport, DS1 and DS3 inputs. This information, if disclosed to competitors, would give them an unfair advantage in structuring their operations and their entry and marketing strategies to ensure their success in competing with GTE.

Late-Filed Exhibit No. 10. This exhibit explains in more detail the determination of Direct Trunked Transport costs. This information, if disclosed to competitors, would give them an unfair advantage in structuring their operations and their entry and marketing strategies to ensure their success in competing with GTE. The transport area is already very competitive.

Late-Filed Exhibit No. 11. This exhibit explains the rationale for GTE decreasing the average holding time. The average holding time used in the AT&T arbitration represents an average holding time for 1995. The holding time used by GTE in Docket No. 950984-TP was based on sample data for a prior period.

Late-Filed Exhibit No. 12. This exhibit details the determination of GTE's tandem switching costs. It provides cross-references and formula listings in the spreadsheet template provided in GTE's original filing of the TSLRIC Workpapers Binder. This information, if disclosed to competitors, would give them an unfair advantage in structuring their operations and their entry and marketing strategies to ensure their success in competing with GTE.

Late-Filed Exhibit No. 13. This exhibit provides the detail which supports witness Trimble's testimony Exhibit DBT-2 (i.e., units, TSLRICs, Revenues and associated backup to determine common costs). The pages include a Contribution Analysis Workpaper with supporting schedules which provide detail of the revenue components shown in Table 1 - Recovery of Joint and Common Costs, of the exhibit.


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Request for Confidential Classification and Motion for Protective Order in Docket Nos. 960847-TP and 960980-TP were sent via overnight delivery on October 30, 1996 to the parties listed below.

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