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GTE Telephone Operations

Marceil Morrell**
Vice President & General Counsel - Florida

Associate General Counsel
Anthony P. Gillman**
Leslie Reicin Stein*

Attorneys*
Kimberly Caswell
M. Eric Edgington
Ernesto Mayor, Jr.

One Tampa City Center
201 North Franklin Street, FLTC0007
Post Office Box 110
Tampa, Florida 33601
813-483-2606
813-204-8870 (Facsimile)

* Licensed in Florida
** Certified in Florida as Authorized House Counsel

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 Late-Filed Deposition Exhibit Nos. 1, 2 and 3 of Douglas Wellemeyer 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

RECEIVED & FILED
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11651 OCT 31 88
FPSC-RECORDS/REPORTING

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 Exhibit Nos. 1, 2 and 3 of Douglas Wellemeyer 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 concern GTEFL's analysis for calculating wholesale costs for resold services. 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 in competing with GTEFL.

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FPSC-RECORDS/REPORTING

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 is attached to the original of this Request as Exhibit A. 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: 

Kimberly Caswell
Anthony Gillman
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2615

Attorneys for GTE Florida Incorporated

Exhibit C

Pages 1-80, Late Filed Exhibit No. 1, Column 3, Amount. These pages entitled "GTE Domestic Telephone Operations, Avoided Cost Analysis, Workcenter Results by Account" provide expenses by workcenter and account for 1995. These pages set forth competitively sensitive financial information broken down by USOA account level detail.

Pages 1-20, Late Filed Exhibit No. 1, all columns containing numbers. These pages entitled "GTE Modified Avoided Cost Study, Workcenter Costs by USOA Account" contain the same expense data as provided in the first document, organized as used in GTE's Modified Cost Study by workcenter and account.

Pages 1-34, Late Filed Exhibit No. 2, column labeled "Direct Costs". These pages provide a breakdown of any summary workcenters reported in Attachment V of GTE's Avoided Cost Study, and the location of each detail workcenter contained within such summary workcenters. Again, this data is competitively sensitive financial information.

Pages 2-12, Late Filed Exhibit No. 3, all columns containing figures. The information here concerns GTE's wholesale service connection charge study. This study contains detailed information on all the activities underlying service connections in a resale environment. With this information, GTE's competitors--which now include, potentially, other incumbent local exchange carriers going out of their traditional serving areas--will be able to structure their own operations in the most efficient manner without the usual research and planning. They will also know where GTE is most vulnerable in its cost structure, and can tailor their entry and pricing strategies accordingly.


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.

Donna Canzano
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Tracy Hatch/Michael W. Tye
AT&T
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

Richard D. Melson
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314


Anthony P. Gillman