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November 1, 1996

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

Docket No. 960833-TP, 960846-TP & 960916-TP

Dear Mrs. Bayo:

Enclosed for filing in the above referenced docket are an original and fifteen (15) copies of AT&T's Request for Confidential Classification.

Copies of the foregoing are being served on all parties of record in accordance with the attached Certificate of Service.

Yours truly,

Tracy Hatch

Attachments

cc: Parties of Record

- ACK
- AFA _____
- APP _____
- CAF _____
- CMM _____
- CTR _____
- EAS _____
- LE _____
- LI _____
- OP _____
- RE _____
- SLC
- WAS _____
- OTH *all to Matilda*

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petitions by AT&T Communications)
of the Southern States, Inc.; MCI)
Telecommunications Corporation; MCI Metro)
Access Transmission Services, Inc.; American)
Communications Services, Inc. and American)
Communications Services of Jacksonville, Inc.)
for arbitration of certain terms and conditions)
of a proposed agreement with BellSouth)
Telecommunications, Inc. concerning inter-)
connection and resale under the)
Telecommunications Act of 1996.)
_____)

Docket No. 960833-TP
Docket No. 960846-TP
Docket No. 960916-TP

Filed: November 1, 1996

AT&T'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

AT&T Communications of the Southern States, Inc. (AT&T) hereby requests confidential classification of certain information contained in Tabs 294, 298, 307, 314, 317, 320, 324, 327, 329, 331, 333, 342 and 437 of Volumes XIII, XIV, XV and XVI [FPSC Documents Nos. 07452-96, 07453-96, 07454-96 and 07455-96, respectively] of the supporting documents submitted with AT&T's Petition for Arbitration under the Telecommunications Act of 1996, filed July 17, 1996. The information contained in the above-referenced volumes has been entered into the evidentiary record of this proceeding. Certain data contained in these documents 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.

Since the four volumes initially submitted by AT&T as proprietary are voluminous, only the sections of the volumes for which continued confidential treatment

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is being requested are being submitted with this request. As required by Rule 25-22.006(4)(a), one highlighted and two redacted copies are being submitted. Upon the final determination regarding the AT&T's request, the four volumes will be refiled with the correct redactions. The refiled volumes may then be substituted for the originally filed documents.

I. Summary of Confidential Information

The information for which confidentiality is sought is as follows:

(1) Volume XIII [Doc. No. 07452-96], Tab 294, pages 200011 through 200029, is proposed pricing information. The information contained in this Tab is confidential business information of AT&T.

(2) Volume XIII [Doc. No. 07452-96], Tab 298, pages 200186 through 200208, is an End-To-End Nationwide Marketing Services Description and the Local Service Marketing Service Description. This document includes product delivery plans. Certain information contained in this Tab is confidential business information of AT&T.

(3) Volume XIV [Doc. No. 07453-96], Tab 307 is AT&T's technical plan for entry into the local market for directory assistance. This document provides AT&T network architecture for providing directory assistance service. All the information contained in this Tab is confidential business information of AT&T.

(4) Volume XV [Doc. No. 07454-96], Tab 314, pages 200602 through 200682, is the Local Operator Services Technical Plan which provides strategic data and plans of AT&T's automated call processing platform, call flows, and AT&T's internal

methodology and procedure for providing operator services in the local service market. The information contained in this Tab is confidential business information of AT&T.

(5) Volume XV [Doc. No. 07454-96], Tab 317, page 200734, provides potential AT&T customer volume information. The customer volume data appearing in lines 9 and 10 of this Tab are confidential business information of AT&T.

(6) Volume XV [Doc. No. 07454-96], Tab 320, page 200804, provides AT&T's proposed market entry dates for local service and intervals for various phases for market entry. All of the dates, time intervals, and volume projections contained in lines 5 through 14 of this Tab constitute confidential business information of AT&T.

(7) Volume XV [Doc. No. 07454-96], Tab 324, page 200890, provides customer volume information, headcount, and projected labor information regarding AT&T's capacity to service local customers. The data appearing in lines 9 through 21 is confidential business information of AT&T.

(8) Volume XVI [Doc. No. 07455-96], Tab 327, pages 200932 through 200934, depicts AT&T's competitive assessment of anticipated demand for AT&T local service for both business and residential service. The information contained in this Tab is confidential business information of AT&T.

(9) Volume XVI [Doc. No. 07455-96], Tab 329, pages 200962 through 200998 includes customer volume information, marketing, and business strategy. The information contained in this Tab is confidential business information of AT&T.

(10) Volume XVI [Doc. No. 07455-96], Tab 331, pages 201012, 201013, 201015 contain proposed discounts and corresponding volume commitments and pricing

information. The information contained in this Tab is confidential business information of AT&T.

(11) Volume XVI [Doc. No. 07455-96], Tab 333 contains specific pricing information from negotiations with BellSouth. The information contained in this Tab is confidential business information of AT&T.

(12) Volume XVI [Doc. No. 07455-96], Tab 342 contains proposed cost recovery strategies developed in negotiations with BellSouth. The information contained in this Tab is confidential business information of AT&T.

(13) Volume XVI [Doc. No. 07455-96], Tab 437, pages 400051, 400173, 400174, 400175, 400205, 400206, and 400207 contains customer volume, marketing, and business strategy. The information contained in this Tab is confidential business information of AT&T.

II. Justification for Confidential Information

In accordance with Sections 350.121 and 364.183 Florida Statutes, and 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 for which protection is sought relates to the competitive activities of AT&T and provides specific information, not otherwise available to AT&T's competitors, regarding (1) AT&T's proposed pricing information; (2) AT&T's marketing information for local service; (3) AT&T's methodology, procedure and design structure for providing directory assistance in the local service marketplace; (4) AT&T's methodology, procedure and design structure for providing operator service assisted calls;

(5) AT&T's projected customer volume information for local service; (6) AT&T's proposed market entry plans for local service; (7) AT&T's customer volume information, headcount and projected labor information for local service offering; (8) AT&T's competitive assessment of demand for local service; (9) AT&T's projected customer volume information, marketing and strategy for local service offerings; (10) proposed discounts and volume information for local service; (11) specific pricing information prepared for negotiations with BellSouth; and (12) proposed cost recovery strategies; and (13) AT&T's projections of customer volume and market entry test and implementation dates for local service.

The specific justification for each Tab is provided below.

Tab 294. The information contained on pages 200012 through 200016, and 200018 through 200026 includes specific AT&T proposed pricing for local service and unbundled network elements. Disclosure of this price information would potentially adversely impact AT&T's ability to negotiate with other service providers if publicly disclosed and would provide information to AT&T's competitors which would assist them in their potential contract negotiations.

Tab 298. The information contained on page 200191, lines 4 through 17, provides AT&T's plans for customer accounts associated with AT&T's local services offering, and provides design specifications for the quality and or level of customer service being planned. Disclosure would harm AT&T's competitive position by allowing competitors to plan their offers in advance to meet or exceed the AT&T plans.

The information contained on page 200191, lines 18 through 31, summarizes AT&T's local service strategy for offering customer billing, including AT&T's planned billing features, discounts, type of call detail provided, billing media, billing periods/payments, required deposits, and collection policy. Disclosure would allow our competitors to plan the billing aspects of their local service to meet or exceed AT&T's plans.

The information contained on page 200192, lines 10 through 23, provides AT&T plans to differentiate customer account billing with specific billing features and customer options. Disclosure of this information would impair AT&T's competitive business by giving competitors the benefit of AT&T's market research of customer billing needs or expectations, and AT&T's specific plans to address those needs with special features and options that would differentiate AT&T's local service offer in the marketplace.

The information contained on page 200192, lines 24 through 40, and page 200193, lines 2 through 7, provides AT&T's discount plans and options to differentiate AT&T's local service and to allow AT&T to be competitive in the marketplace. Disclosure would result in AT&T's competitors having access to the discount options being built into AT&T's billing program, and would allow competitors to pre-empt AT&T in the marketplace with similar, or more attractive discount plans. Competitors would be able to build their competitive discount responses into their own respective systems and processes in advance, and introduce them before or at the same time that AT&T's discount plan is introduced, to the detriment of AT&T.

The information contained on page 200193, lines 20 through 37, and on page 200194, lines 2 through 8, provides AT&T's plans to customers with local call details on AT&T's bills. Disclosure of this information would impair AT&T's competitive business by giving competitors the benefit of AT&T market research on customer expectations for call detail, and AT&T's specific plans to address those needs with call detail billing options that would differentiate AT&T's local service offer in the marketplace.

The information contained on page 200194, lines 9 through 13, provides billing formats and media information. Disclosure of the information would give competitors the benefit of market research and AT&T's specific plans.

The information contained on page 200194, lines 14 through 19, provides information on AT&T internal auditing controls. Disclosure would harm AT&T's competitive position and business operations.

The information contained on page 200194, lines 20 through 28, provides AT&T's plans to differentiate the billing process and customer experience associated with local service, and provides AT&T's design specifications for the quality and planned level of customer service. Disclosure would harm AT&T's competitive position by allowing competitors to plan offers in advance to meet or exceed AT&T's plans.

The information contained on page 200194, lines 29 through 33, and page 200195, lines 1 through 9, provides information on the billing cycles planned for AT&T's local service offer and how AT&T plans to track billing verification information. Disclosure of the information would give competitors the benefit of AT&T market

research and AT&T's specific plans. In addition, disclosure of information on internal auditing controls being built to insure billing accuracy would harm AT&T business operations.

The information contained on page 200195, lines 12 through 17, provides information on the structure of customer billing periods and payment schedules. Disclosure would allow AT&T competitors to plan the bill payment aspects of their local service offerings to meet or exceed AT&T's plans.

The information contained on page 200195, lines 24 through 28, and page 200196, lines 1 through 26, provides AT&T's strategy related to the collection of customer deposits. Disclosure of this information would be detrimental to AT&T's competitive interests and would harm AT&T's business operations by revealing AT&T's planned security measures, policies and procedures.

The information contained on page 200196, lines 27 through 35, provides AT&T's planned policy related to customer credit risk assessment and AT&T's policy for non-payment. Disclosure would harm AT&T's business operations by revealing AT&T's planned security measures, policies and procedures.

The information contained on page 200198, lines 16 through 33, summarizes AT&T's sales distribution strategy and AT&T's plans for local service. Disclosure of this information would harm AT&T's competitive position by allowing competitors access to AT&T's plans. Disclosure of the information also would enable competitors to pre-empt AT&T by targeting certain customer segments in direct response to the level of sales/sales support planned by AT&T.

The information contained on page 200201, lines 3 through 7, summarizes AT&T's billing strategy for offering local service, including reference to billing features planned based on AT&T's market research. Disclosure of AT&T's billing plans would impair AT&T's competitive business. Competitors would obtain an unfair advantage by obtaining the benefit of AT&T's market research around customer billing needs/expectations.

The information contained on page 200202, lines 4 through 23, provides a description of the calling plans and pricing discount plans and options which are critical to AT&T's local service offering in the marketplace. Disclosure would result in AT&T's competitors having access to the calling plan and discount options being built into AT&T's billing platform, and would allow them to pre-empt AT&T in the marketplace with similar, or more attractive plans.

The information contained on page 200203, lines 29 through 40; page 200204 lines 2 through 37; and page 200205, lines 2 through 4, provides AT&T's plans for local service billing features. Disclosure of this information would harm AT&T's ability to compete by giving competitors the benefit of AT&T's market research. Disclosure also would harm AT&T's competitive position by allowing competitors to develop customer service plans and quality metrics for billing based on AT&T's plans.

The information contained on page 200205, lines 5 through 16, constitutes information relating to AT&T's plans to track local service traffic. These plans are part of AT&T's internal auditing controls and disclosure would harm AT&T's business operations.

The information contained on page 200205, lines 17 through 32, and page 200206, lines 1 through 25, provides information on AT&T's policy for bill payments, and AT&T's collection strategy. Disclosure of this information would allow competitors to introduce bill payment terms and deposit policies based on AT&T's plans.

The information on page 200206, lines 27 through 38, page 200207, lines 1 through 34, and page 200208, lines 1 through 5, contains AT&T's billing plans. This information on customer credit risk assessment and service termination policy, relates to AT&T's competitive interests and disclosure would impair AT&T's business operations by revealing planned security measures, policies and procedures.

Tab 307. AT&T seeks confidential treatment for all of the information contained in Tab 307. Tab 307 contains AT&T's technical plan for handling 411 and directory assistance calls in the local market. This information reveals AT&T's network capabilities and services to be made available in the future for directory assistance call routing. The information also provides detailed descriptions of AT&T's architecture for providing the directory assistance service including how AT&T has built its platform, established call flow in its network including routing and rerouting call traffic from Local Exchange Companies to AT&T's platform. Disclosure of this information could provide competitors with information about AT&T's network and cause competitive harm to AT&T.

The information contained in this Tab also refers to the marketing strategy surrounding AT&T's directory assistance service platform. The marketing information includes market entry dates, projected forecast volumes, and volumes of calls, and the

marketing plans for handling these types of calls. In addition, the marketing plans provide information on how AT&T is approaching the market place and AT&T product structure and pricing, including projections as to AT&T's market position with regard to directory assistance service. The marketing plans include product enhancement features unique to AT&T which are currently in the developmental stages. Disclosure of this information would provide competitors with the ability to manipulate the timing and pricing of their own offerings of directory assistance services thereby giving competitors an unfair advantage in the directory assistance local service market.

The document also contains references to agreements with vendors and vendor information for providing directory assistance service. Disclosure of this information could allow competitors to obtain proprietary vendor information in violation of AT&T's agreement with these vendors. Disclosure of this information also would allow competitors to leverage negotiations with other third party service providers at a lower unit cost placing them in a position to undercut AT&T's pricing structure.

The document also provides customer billing and recording capabilities and AT&T's pricing of various services. The billing and recording information includes internal routing numbers and codes which could allow end users to circumvent billing for the directory assistance and for the automatic dialing feature when activated. Disclosing this information would be detrimental to AT&T's internal security measures and would affect its ability to charge for these services.

The recording and billing information also provides AT&T's recording capabilities and would provide competitors with information regarding AT&T's pricings

for various services. Competitors could use this information to create new record systems, service capabilities, and pricing structures resulting in an unfair competitive advantage to the detriment of AT&T.

Tab 314. The information contained on page 200603, lines 29 through 33, provides details about AT&T's automated call processing platform. Disclosure of this information would provide competitors insight into AT&T's call processing platform which is confidential to AT&T.

The information contained on page 200606, lines 17 through 26, provides details of AT&T's internal network arrangements and operator platform. Using this information, AT&T competitors could develop their own plans for a similar system.

The information contained on page 200608, lines 9 through 13, provides confidential market entry dates for operator services. Disclosure of this information could allow competitors to obtain an unfair advantage and to strategically plan their market entry dates for similar operator services to the detriment of AT&T.

The information contained on page 200608, lines 29 through 35, provides information regarding the details of AT&T's automated platform for providing operator assisted service, including how AT&T will technically arrange for customers to obtain operator services by way of network configurations. This automated platform is unique to AT&T. Disclosure of this information would significantly harm AT&T's competitive position in the local service market by allowing competitors insight into AT&T's proprietary system.

The information contained on page 200609, lines 1 through 20, provides AT&T's competitive analysis and AT&T's product strategy for providing operator assisted call service. This information identifies how AT&T will handle the routing of certain types of calls. Disclosure of this information would allow competitors to obtain information unique to AT&T services thereby harming AT&T's competitive position.

The information contained on page 200609, lines 21 through 42, and page 200610, lines 1 through 3, provides information regarding AT&T's market entry strategy and vendor information for providing local service. Revealing this information could allow competitors to obtain AT&T's marketing strategy and vendor information which would put AT&T's competitors at an unfair competitive advantage in the local service market.

The information contained on page 200610, lines 6 through 9, and lines 14 through 17, provides confidential forecast information regarding projected call volume and subscriber information. Disclosure of this information would give competitors in the local services market insight into AT&T's plans regarding local service. Disclosure of this information would put AT&T at a competitive disadvantage.

The information contained on page 200611, lines 8 through 15, lines 20 through 24, and lines 28 through 35, provides details of AT&T's automated platform and call processing programs. Disclosure of this information would give competitors insight into AT&T's proprietary system.

The information contained on page 200612, lines 1 through 4, provides details of AT&T's internal operation procedures for obtaining resale services for operator assisted

call service. Disclosure of this information would give competitors an unfair advantage in providing local service.

The information contained on page 200612, lines 7 through 11, lines 16 through 19, lines 21 through 27, lines 28 through 32; page 200613, lines 2 through 12, lines 14 through 18, lines 20 through 22, lines 24 through 25, lines 27 through 28, line 29; page 200614, lines 2 through 4, lines 6 through 22, and lines 24 through 36 constitutes AT&T strategic product decisions for providing operator assisted call service. Disclosure of this information would give competitors an unfair advantage and allow them to develop programs similar to AT&T's to the commercial detriment of AT&T.

The information contained on page 200615 provides AT&T's marketing plans and strategies for providing operator services in the local service market. Disclosure of this information would give competitors an unfair advantage and allow them to develop similar products and strategies to the detriment of AT&T.

The information contained on page 200616, lines 1 through 17, provides AT&T's strategic competitive information regarding operator assistance transferring service for providing operator assisted call service. Disclosure would result in AT&T's competitors having access to AT&T's strategy and would allow them to utilize this information to develop competing systems to the detriment of AT&T.

The information contained on page 200616, lines 18 through 23, and lines 31 through 39, provides details of AT&T's automated platform for providing operated assisted service. This automated platform is unique to AT&T. Disclosure of this

information would significantly harm AT&T's competitive position by allowing competitors to design their own platform using this information.

The information contained on page 200617, lines 1 through 2, and lines 4 through 7, provides details regarding how AT&T will utilize operators to provide rate quote information for customers. Disclosure of this information would significantly harm AT&T's competitive position by allowing competitors to develop similar rate quote systems to the detriment of AT&T.

The information contained on page 200618, lines 25 through 26, provides details regarding AT&T's operator processing and strategic business strategy. Disclosure of this information would harm AT&T's ability to compete in the local service market.

The information contained on page 200619, lines 30 through 34, provides technical system design information regarding routing of calls with a Local Exchange Company. Disclosure of this information would result in a dilution of AT&T's competitive advantage and would provide an advantage to AT&T's competitors.

The information contained on page 200621, lines 7 through 8, provides details regarding AT&T's negotiation strategies. Disclosure of this information would allow competitors to use the information in their own negotiations thereby improving their market positions to the detriment of AT&T.

The information contained on pages 200622 through 200623 constitutes specifications for AT&T trunking configurations for different operator call types. This information constitutes network technical system design unique to AT&T for transferring

calls. Disclosure of this information would allow competitors to use this information to their advantage and to the detriment of AT&T.

The information contained on pages 200624 through 200647, lines 1 through 12, provides AT&T's call handling plans and provides information on AT&T's network. Public disclosure of this information would give AT&T's competitors an unfair competitive advantage.

The information contained on pages 200647, lines 27 through 30, provides details about AT&T's billing and recording of calls and call data billing information system design. Public disclosure of this information would give AT&T's competitors an unfair competitive advantage.

The information contained on page 200648, lines 2 through 5, lines 7 through 8, and lines 13 through 16, provides for AT&T's internal procedures on how calls will be recorded and billed. Public disclosure of this information would allow competitors to develop a similar system which would put them at an unfair competitive advantage in the local service marketplace.

The information contained on page 200648, lines 19 through 25, refers to AT&T's system design for solutions for local portability. Public disclosure of this information would give AT&T's competitors an unfair competitive advantage in the local service marketplace.

The information contained on page 200649, lines 4 through 5, lines 8 through 13, lines 15 through 21, lines 23 through 26, and lines 28 through 30 provides AT&T's internal procedures for call recording and billing. Public disclosure of this confidential

information would give AT&T's competitors an unfair competitive advantage in the local service marketplace.

The information contained on page 200650 lines 6 through 10, provides internal methods and procedures for operator handling of calls. Disclosure of this information would allow competitors to develop similar procedures and would place them at an unfair competitive advantage in the local service marketplace.

The information contained on pages 200650, lines 11 through 36, pages 200651 through 200652, lines 1 through 12, provides information on how to handle certain types of operator assisted calls. This information contains confidential details of AT&T's strategy and the technical functions. Disclosure of this information would allow competitors to develop similar procedures and would place them at an unfair competitive advantage in the local service marketplace.

Information contained on page 200652, lines 14 through 24, provides details of AT&T's automated platform for providing operator assisted services. This automated platform is unique to AT&T, accordingly, disclosure of this information would significantly harm AT&T's competitive position.

Information contained on page 200654, lines 10 through 37, and pages 200655 through 200656, refers to AT&T's planning strategy and market entry for feature enhancements to AT&T service. Disclosure of this information would allow competitors to develop similar features that would provide a competitive advantage to the detriment of AT&T.

Information contained on page 200657, lines 2 through 5, provides AT&T's internal procedures for call recording and billing. Public disclosure of this information would allow competitors to develop a similar system which would put them at an unfair competitive advantage in the local service marketplace.

Information contained on pages 200658 through 200669 provides AT&T internal quality performance standards and technical requirements to meet performance standards. These quality performance standards are unique to AT&T. Accordingly, disclosure of this information would significantly harm AT&T's competitive position in the local service market by allowing competitors to design their own systems using this information.

Information contained on pages 200671 through 200677 refers to AT&T's process of studying and reviewing the implementation of operator assisted call services. Disclosure would result in AT&T's competitors having access to AT&T's strategy for providing operator assisted call service in the local service marketplace and would allow them to utilize this information to develop competing systems to the detriment of AT&T.

Information contained on page 200678 provides internal documents supporting the development and implementation of AT&T's local operator service and includes confidential technical product and marketing information. Disclosure of this information would result in AT&T's competitors having access to this information.

Information contained on page 200681, line 20, refers to trunking configurations for different operator call types. This information constitutes network technical system design unique to AT&T for transferring calls to a customer. Disclosure of this

information would allow competitors to use this information to their advantage and to the detriment of AT&T.

Information contained on page 200681, lines 21 through 31 provides internal methods and procedures for operator handling of calls. Disclosure of this information would allow competitors to develop similar procedures and would place them at an unfair competitive advantage in the local service marketplace.

Information contained on page 200681, lines 49 and 50, refers to risk assessment discussions and strategy AT&T has used to handle types of operator assisted calls. Disclosure of this information would allow competitors to develop similar procedures and would place them at an unfair competitive advantage in the local service market place.

Information contained on page 200682, lines 1 through 6, provides AT&T's planning strategy and market entry for feature enhancements to AT&T service and internal procedures on how calls will be recorded and billed. Disclosure of this information would allow competitors to develop similar features that would provide a competitive advantage to the detriment of AT&T.

Information contained on page 200682, lines 7 through 23, provides internal quality performance standards and technical requirements to meet these performance standards. These quality performance standards are unique to AT&T. Accordingly, disclosure of this information would significantly harm AT&T's competitive position in the local service market by allowing competitors to design their own systems using this information.

Information contained on page 200682 lines 28 through 31, refers to AT&T's process for review and implementation of operator assisted call services. Disclosure would result in AT&T's competitors having access to AT&T's strategy for providing operator assisted call service in the local service marketplace and would allow them to utilize this information to develop competing systems to the detriment of AT&T.

Tab 317. The information contained in lines 9 and 10 of page 200734 is potential customer volume information. Disclosure of this information could allow competitors to obtain marketing information and information regarding AT&T's capacity to provide local service. Using such information, AT&T's competitors could develop future marketing plans to the detriment of AT&T. Public disclosure of AT&T's information would put AT&T's competitors at an unfair competitive advantage in the local service market.

Tab 320. The information contained in lines 5 through 14 of page 200804 provides AT&T's estimates of customer volume and market entry test and implementation dates for providing local service. AT&T's competitors could use such information to develop marketing strategies to the detriment of AT&T by viewing AT&T's planned market entry dates and determining future general availability dates for AT&T's entry into the local service markets. Information on specific marketing decisions is closely guarded information in any competitive environment. Public disclosure of AT&T's information would put AT&T's competitors at an unfair competitive advantage and would unfairly disadvantage AT&T in its efforts to compete with other carriers in the local service market.

Tab 324. The information contained in lines 9 through 21 of page 200896 provides customer volume information, headcount, and projected labor information. The headcount and cumulative labor costs could reveal competitive information regarding the operation of AT&T's Customer Network Service Center and operational costs of this Center. This information could be utilized by AT&T's competitors in formulating their negotiation strategies with AT&T and hinder AT&T's ability to obtain the necessary operational interfaces to be effective in the local service marketplace. This information could be used by competitors to place themselves in an advantageous position in the local service marketplace. Public disclosure of AT&T's information would put AT&T's competitors at an unfair advantage and would unfairly disadvantage AT&T in its efforts to compete with other carriers in the local service market.

Tab 327. The information contained on lines 6, 8, 10, 14, 16, and 18 of page 200932, lines 8, 9, 10, 12, 16, 18, 19, and 20 on page 200933, and lines 9, 10, 11, 12, 13, 17, 18, 19, 20, and 21 on page 200934 provides specific data, year by year, of AT&T's projected demand for local service. Public disclosure of this data would give AT&T competitors in the local services market insight into AT&T's plans regarding local service and would enable them to focus their efforts in acquiring local service customers based upon this knowledge. Disclosure of this data, therefore, would put AT&T at a competitive disadvantage in its efforts to compete in the local services market.

Tab 329. The information contained in Tab 329 includes customer volumes, markets to be entered, assumptions about AT&T's business practices and strategy, and market entry options. This information reveals the manner and degree to which AT&T

plans to employ alternate market entry strategies as well as the specific strategies/vehicles AT&T plans to employ. Disclosure of this information could allow a competitor to preempt AT&T's market entry or otherwise prepare for impending competition in a particular market by AT&T to the detriment of AT&T. The customer volume information would potentially reveal marketing information regarding AT&T's capacity to service local service customers.

Tab 331. The information contained on pages 201012, line 7, 201013, lines 15-22, and 201015, line 41, includes AT&T's proposed discounts and corresponding volume commitments/price points for the purchase of services from BellSouth. Disclosure of the customer volumes could potentially reveal marketing information and information regarding AT&T's capacity to service local service customers. Disclosure of the discounts and prices could potentially adversely impact AT&T's ability to negotiate with other service providers.

Tab 333. The information contained on pages 201080 through 201092 includes specific proposed price points in contract service agreements. AT&T could be harmed if this information were shared with a competitor. The prices would potentially adversely impact AT&T's ability to negotiate with other service providers and would provide information to AT&T's competitors which would assist them in their potential contract negotiations.

Tab 342. The information contained in lines 8 through 37 includes proposed cost recovery strategies developed in negotiations with BellSouth. Disclosure of which could hinder AT&T's ability to negotiate with other local service providers.

Tab 437. The information contained on page 4900051 includes customer volumes and market entry test and implementation dates. Disclosure of this information could harm AT&T's competitive status, because it discloses customer volumes, marketing information, and information regarding AT&T's capacity to service local service customers. The dates and intervals are proprietary because they would allow competitors to view AT&T's planned market entry dates. Additionally, competitors could determine future general availability dates by overlaying the intervals outlined in this document to specific markets. Such information would allow competitors to preempt AT&T's market entry or otherwise prepare for competition from AT&T.

The information contained on pages 490173 through 490175 and 490205 through 490207 provides information of AT&T's plans for providing unbundled network function combinations. AT&T's plans for providing unbundled network elements provides competitors the alternate market entry strategies as well as the strategies/vehicles AT&T plans to employ. References to specific dates and the relative service availability dates may provide competitors with insight as to AT&T's prioritization of alternate market entry strategies.

The above referenced information in Tabs 294, 298, 307, 314, 317, 320, 324, 327, 329, 331, 333, 342 and 437 constitutes proprietary confidential business information which must be protected from public disclosure. It 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 can obtain economic value from the disclosure and use of such information. Information of this sort is not available to AT&T with respect to the activities of its competitors, and such information should not be made available to AT&T's competitors.

The above referenced information constitutes trade secrets pursuant to Section 364.183(3)(a), 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. The subject 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 can obtain economic value from the disclosure and use of such information. Information of this sort is not available to AT&T with respect to the activities of its competitors, and such information should not be made available to AT&T's competitors. In short, public disclosure of this information would seriously harm AT&T's ability to compete in the local service marketplace, would seriously disadvantage AT&T to the advantage of its competitors, and could lead to a local service marketplace that is less competitive rather than more competitive.

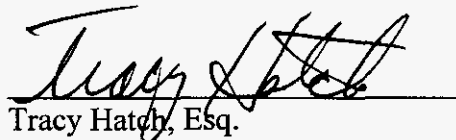
III. Duration of Confidentiality

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. Conclusion

In accordance with the provisions of Rule 25-22.006(4)(a), Florida Administrative Code, the requested information has been provided in two forms. Attachment A is a copy of the information in which the proprietary material has been highlighted. Attachment B (two copies provided) is a redacted version which contains the information in its non-proprietary form. Attachment A, which contains the complete information, should be classified as Confidential Information for the reasons set forth above.

Respectfully submitted this 1st day of November 1996.



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ATTORNEYS FOR AT&T
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SOUTHERN STATES, INC.

CERTIFICATE OF SERVICE

DOCKET NOS. 960833-TP, 960846-TP and 960916-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 1st day of November, 1996:

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