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May 9, 1997

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:

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 matters. Service has been made as indicated on the Certificate
of Service. If there are any questions regarding this filing, please contact me at (813)
483-2615.

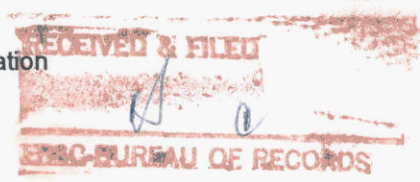
Very truly yours,

Anthony P. Gillman
Anthony P. Gillman

APG:tas
Enclosures

A part of GTE Corporation

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



DOCUMENT NUMBER-DATE
04682 MAY-95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T Communications of the)	Docket No. 960847-TP
Southern States, Inc., MCI Telecommunications)	Docket No. 960980-TP
Corporation and MCI Metro Access Transmission)	Filed: May 9, 1997
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)	
_____)	

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 costing information submitted in response to Order No. PSC-97-0064-FOF-TP (Order). 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 are GTEFL's cost studies for the Company's provision of Custom Routing of Operator Services and Directory Assistance. GTEFL was required to file these studies pursuant to the Order issued in these dockets. (Order at 34.)

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. 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

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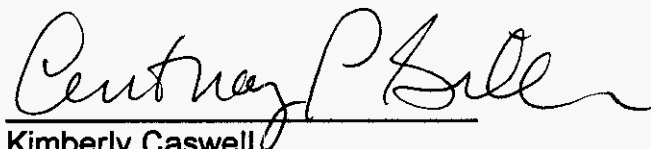
FPSC-RECORDS/REPORTING

competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. 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 establish terms and conditions for 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). A more detailed justification of the confidentiality of the information at issue is attached as Exhibit C. Exhibits A and B are highlighted and redacted copies, respectively, of the confidential information.

Respectfully submitted on May 9, 1997.

By:



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Attorneys for GTE Florida Incorporated

Custom Routing of Operator Services & Directory Assistance

GTE - FLORIDA

Cost Summary

Initial Expense for GTE Systems modification (page 1)

	number of alternative providers				
	1	2	3	4	5

MARK system
NEDAS system
Testing

(cost for each alternative provider using at least one GTE switch facility in Florida)

Additional memory expense (page 2)

Investment required by GTE per host central office,
per alternative provider.

Data Base expense (pages 3-6)

One time expense per switch, per alternative provider.

<u>1st Class of Service</u>	<u>Each Additional Class of Service</u>
---------------------------------	---

5ESS Switch Type
DMS 100 Switch Type
DMS 10 Switch Type
GTD-5 Switch Type

These costs were developed to recover switch investment and expense only. Transport and trunk port connection expenses are not included and should be recovered based on unbundled network elements specific to customer specifications.

MODIFICATION OF SYSTEMS EXPENSE

These expenses are incurred on a total GTE basis, and are allocated to every state that GTE currently operates in. The expenses noted below were allocated based on the number of lines currently served by digital switches that are capable of allowing custom routing of alternative provider OS/DA traffic. These expenses for Florida are an allocation of system modification and testing expenses.

Mechanized Assignment Record Keeping System

This GTE system administers operating telephone company local exchange plant facilities. The system allocates and assigns working and available central office and outside plant facilities from its inventory and must be modified to allow ALEC identifiers.

NEDAS SYSTEM

The NEDAS system is a provisioning system for service orders.

TEST ANALYSIS

Testing to verify switch limitations and capabilities for routing ALEC's OA/DA traffic.

Cost for each alternative provider using GTE switch facilities in Florida.

	<u>number of alternative providers</u>				
	1	2	3	4	5
MARK system					
NEDAS system					
Testing					
TOTAL COSTS					

REDACTED

1000091

ADDITIONAL MEMORY EXPENSE

GTE currently provides service to most of its customers from digital host or remote offices. These switch technologies in Florida consist mainly of the GTD-5, the DMS-100 along with over twenty 5ESS switches.

Currently, an efficient long-term solution for alternative providers service has not been developed by switching equipment vendors. In the interim, GTE will utilize a work around known as "Line Class Code-Rate Center." The work around solution will require additional memory utilization by all switch types. Based on documentation provided by Lucent Technologies, an estimate was developed by GTE traffic management for switch utilization. The total investment required to be invested by GTE for each alternative provider, per switch, would be

At the current time, this is the only methodology provided to estimate the requirement for additional memory cost requirements for any switch type.

REDACTED

DATA BASE EXPENSE FOR A 5ESS

Add one new class of service
with 0-, 0+local, 0411, 1411,
1+HNPA-555-1212,
0+HNPA-555-1212 redirected.

1st Class
of Service
in Office

Additional
Classes of
Service

Work Order Review:

Review CLR
Review Billing Requirements
Review Trunk Parameters
Review Service Order
Review Data Gathering
Review Screening/Routing/Billing
Check Existing Service & Tariffs
Build Test Plan
DBM Review

Verify Office
Examine CDI, RTI, CHGI
Dump RAR of duplicated service
Build new RAR
Build Script and load new RAR
Add TG and 24 Trunk Members
Build 3 new RTIs (0-,0+local,D.A.)
Add new DN and Verify Office
DBM Implementation
Test Plan

Grand Total for 5ESS

REDACTED

1000093

DATA BASE EXPENSE FOR A DMS 100

Add one new class of service
with 0-, 0+local, 0411, 1411,
1+HNPA-555-1212,
0+HNPA-555-1212 redirected.

1st Class
of Service
in Office

Additional
Classes of
Service

Work Order Review:

Review CLR
Review Billing Requirements
Review Trunk Parameters
Review Service Order
Review Data Gathering
Review Screening/Routing/Billing
Check Existing Service & Tarrifs
Build Test Plan
DBM Review

Verify Office
Examine CDI, RTI, CHGI
Dump RAR of duplicated service
Build new RAR
Build Script and load new RAR
Add TG and 24 Trunk Members
Build 3 new RTIs (0-,0+local,D.A.)
Add new DN and Verify Office
DBM Implementation
Test Plan

Grand Total for DMS 100

REDACTED

1000094

DATA BASE EXPENSE FOR A DMS 10

Add one new class of service
with 0-, 0+local, 0411, 1411,
1+HNPA-555-1212,
0+HNPA-555-1212 redirected.

1st Class
of Service
in Office

Additional
Classes of
Service

Work Order Review:

Review CLR
Review Billing Requirements
Review Trunk Parameters
Review Service Order
Review Data Gathering
Review Screening/Routing/Billing
Check Existing Service & Tarrifs
Build Test Plan
DBM Review

Verify Office
Examine CDI, RTI, CHGI
Dump RAR of duplicated service
Build new RAR
Build Script and load new RAR
Add TG and 24 Trunk Members
Build 3 new RTIs (0-,0+local,D.A.)
Add new DN and Verify Office
DBM Implementation
Test Plan

Grand Total for DMS 10

REDACTED

1000095

DATA BASE EXPENSE FOR A GTD-6

Add one new class of service
with 0-, 0+local, 0411, 1411,
1+HNPA-555-1212,
0+HNPA-555-1212 redirected.

1st Class
of Service
in Office

Additional
Classes of
Service

Work Order Review:

Review CLR
Review Billing Requirements
Review Trunk Parameters
Review Service Order
Review Data Gathering
Review Screening/Routing/Billing
Check Existing Service & Tarrifs
Build Test Plan
DBM Review

Verify Office
Examine CDI, RTI, CHGI
Dump RAR of duplicated service
Build new RAR
Build Script and load new RAR
Add TG and 24 Trunk Members
Build 3 new RTIs (0-, 0+local, D.A.)
Add new DN and Verify Office
DBM Implementation
Test Plan

Grand Total for GTD 5

REDACTED

1000096

EXHIBIT C

- Page 1000090 (all numbers):** The numbers on this page summarize the cost to provide customized routing of operator services and directory assistance. The costs are broken down by system expense, additional memory expense and data base expense. Disclosure of this information to GTE's competitors will provide such competitors insight into specific costs of making modifications to GTE's systems. With this information, such competitors may be better able to predict GTE's response to competitive offerings.
- Page 1000091 (all numbers):** The numbers on this page depict the costs of making modifications to GTE's systems. This page contains specific cost information regarding changes made to GTE's Mechanized Assignment Record Keeping System and its NEDAS provisioning system. Specific costs are also provided for testing to verify GTE's switch limitations and capabilities. As set forth above, if competitors are able to acquire this information, especially to this level of detail, they are better able to compete with GTE in offering their own services.
- Page 1000092 (last number in second paragraph):** This page contains the costs for additional memory. Specifically, GTE lists the investment needed to make a "Line Class Code-Rate Center," broken down on a per switch basis. Again, this specific cost information could be used by competitors to develop their own marketing strategies in competing with GTE.
- Pages 1000093-96 (second and third columns):** These pages contain specific costs for database modification review, implementation and testing to provide the customized routing. The information is also specific to GTE's central offices. Page 1000093 pertains to the 5ESS central office; 1000094 pertains to a DMS-100 office; 1000095 pertains to a DMS-10 office; and Page 1000096 pertains to a GTD-5 office. Disclosure of this information to GTE's competitors, especially to this level of detail, will provide such competitors insight into specific costs of making modifications to GTE's systems. With this information, such competitors will be better able to predict GTE's response to competitive offerings or to otherwise compete with GTE.

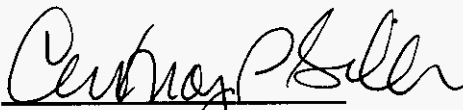
CERTIFICATE OF SERVICE

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 U.S. mail on May 9, 1997 to the parties listed below.

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