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September 16, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Docket No. 960786-TL

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc. ("TCG") are the following documents:

- 1. Original and fifteen copies of TCG's Request for Confidential Classification of Paul Kouroupas' Late-Filed Deposition Exhibit Nos. 1, 2, 4 and 5; and
- 2. An envelope containing a copy of the documents considered confidential.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

William B. Willingham
William B. Willingham

ACK _____
 FA _____
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 AF _____
 MU _____
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 LEG _____
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 OP _____
 RC _____
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 WAS _____
 OTH _____

RECEIVED & FILED
 WBW
 cc: All Parties of Record
 FLORIDA BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
 09444 SEP 17 5
 FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc.'s entry)
into interLATA services pursuant)
to Section 271 of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL

Filed: September 16, 1997

**TELEPORT COMMUNICATIONS GROUP INC.'S
REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF PAUL KOUROUPAS'
LATE-FILED DEPOSITION EXHIBIT NOS. 1, 2, 4 and 5**

Teleport Communications Group Inc. ("TCG"), by and through its undersigned counsel and pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, submits this Request for Confidential Classification of portions of Paul Kouroupas' Late-filed Deposition Exhibit numbers 1, 2, 4 and 5 that were filed with the Commission on August 27, 1997 in the above-styled docket. In support of this Request, TCG states as follows:

1. On August 20, 1997, during the deposition of TCG witness Paul Kouroupas in the above-styled docket, the Staff of the Florida Public Service Commission requested that Mr. Kouroupas provide five (5) late-filed exhibits. TCG believes that certain information and material in Late-filed Deposition Exhibit numbers 1, 2, 4 and 5 are confidential and proprietary. On August 27, 1997, TCG filed the exhibits with a Notice of Intent to Request Confidential Classification of Kouroupas' Late-filed Deposition Exhibit numbers 1, 2, 4 and 5, thereby allowing Staff to take possession of this confidential and proprietary information without delay.

2. Late-filed Deposition Exhibit Number 1 identifies the number of circuits that TCG utilizes in Florida. Moreover, the information identifies the number of circuits on TCG's own

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

facilities and the number of circuits on BellSouth's facilities that TCG uses. This information directly relates to TCG's competitive interests. Disclosure of this information would impair TCG's competitive business interests by allowing competitors to determine the amount of traffic being transmitted over TCG's own facilities and the amount of traffic that is transmitted over TCG's entire Florida network. This information is intended to be and is treated by TCG as proprietary and confidential. TCG requests that this information be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes.

3. Late-filed Deposition Exhibit Number 2 contains two reports that contain information and material which directly relate to and impact TCG's competitive interests. The report titled "TELEPORT COMMUNICATIONS 1997 MAINTENANCE RESULTS" provides service interruption data for the facilities that BellSouth provides to TCG. The report titled "PERFORMANCE REPORTING"¹ provides information regarding the number of TCG's circuits that BellSouth monitors for performance. Disclosure of this service interruption information would impair TCG's competitive business interests by providing TCG's competitors with information regarding service interruptions and maintenance problems on BellSouth's facilities that have impacted TCG's customers. Disclosure of the circuit information would impair TCG's competitive business interests by allowing competitors to determine the amount of traffic being transmitted over TCG's network. This information and material is intended to be and is treated by TCG as proprietary and confidential. TCG requests that this information and material be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes.

¹ This information is set forth on the pages in the report titled "WHAT DO WE DO?" and "HISTORY".

4. Late-filed Deposition Exhibit Number 4 identifies the number of trunks and unbundled loops that TCG utilizes in Florida. This information and material is intended to be and is treated by TCG as proprietary and confidential as public disclosure of such information would adversely impact TCG's competitive business interests. TCG requests that this information be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes. The Commission previously has determined that this type of information is entitled to the protection of Section 364.183(3), Florida Statutes. See Order No. PSC-97-1039-CFO-TL, issued in this proceeding on September 2, 1997.

5. Late-filed Deposition Exhibit Number 5 identifies the name of a TCG customer that resells residential service over TCG's facilities. Disclosure of this information would impair TCG's competitive business interests by providing TCG's competitors with the name of a significant TCG customer and information regarding the specific services that TCG provides to such customer. This information is intended to be and is treated by TCG as proprietary and confidential. TCG requests that this information be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes.

6. An unedited version of Mr. Kouroupas' Late-filed Deposition Exhibit numbers 1, 2, 4 and 5 has been submitted to the Division of Records and Reporting on this date under a separate cover with the information asserted to be confidential highlighted in yellow. An edited version of the documents on which the information asserted to be confidential has been blocked out is enclosed herewith.

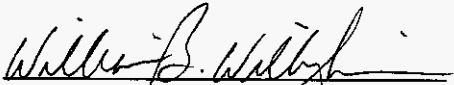
7. TCG requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 364.183(4), Florida

Statutes.

WHEREFORE, for the foregoing reasons, TCG respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by Hand Delivery (*) and Federal Express to the following this 16th day of September, 1997:

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WILLIAM B. WILLINGHAM, ESQ.

REQUEST: Provide a breakdown of Type 1 and Type 2 circuits.

RESPONSE: TCG South Florida utilizes the following circuits:

Type I:
Type II:



Type 1 refers to TCG's own facilities; Type 2 refers to the use of BellSouth's facilities.

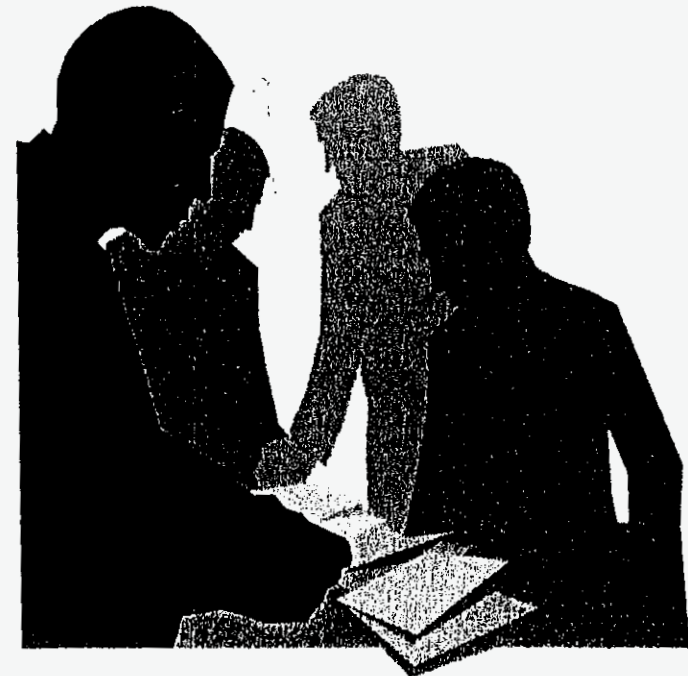
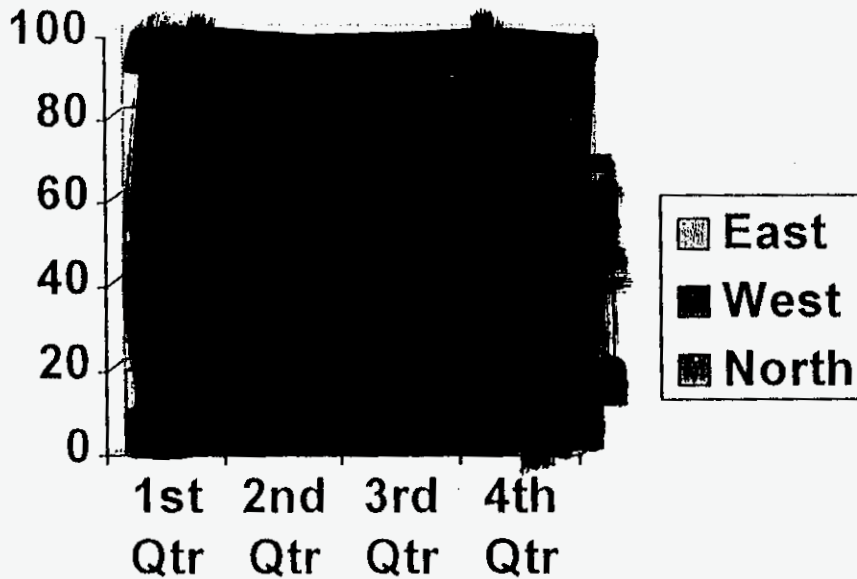
THIS RESPONSE CONTAINS PROPRIETARY AND CONFIDENTIAL INFORMATION

REQUEST: Please provide an example of the BellSouth Account Team reports given to TCG South Florida.

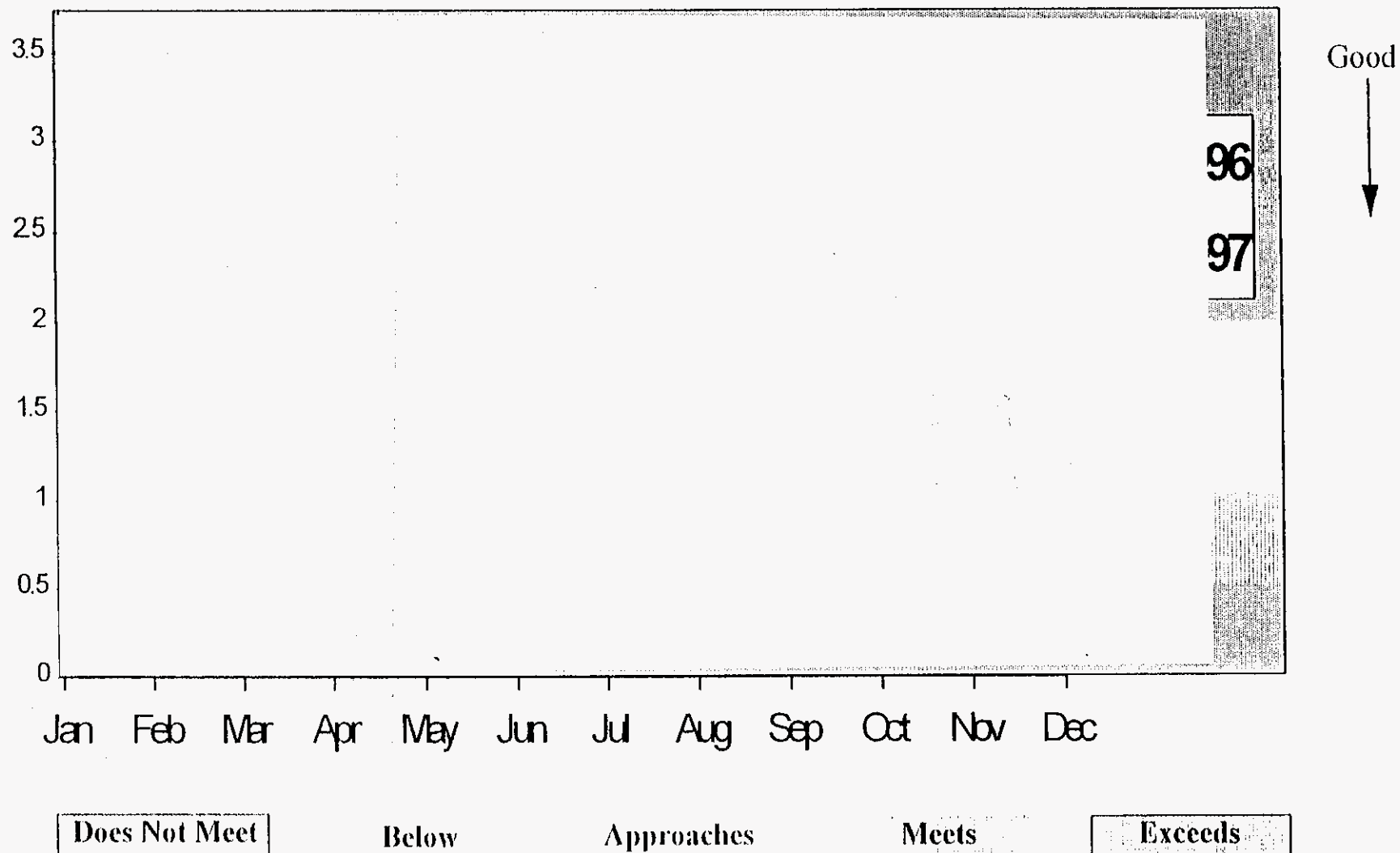
RESPONSE: The "Teleport Communications 1997 Maintenance Results" and the "Performance Monitoring" summary provided by BellSouth account teams to TCG South Florida are attached. These documents contain information that is confidential and proprietary.

TELEPORT COMMUNICATIONS

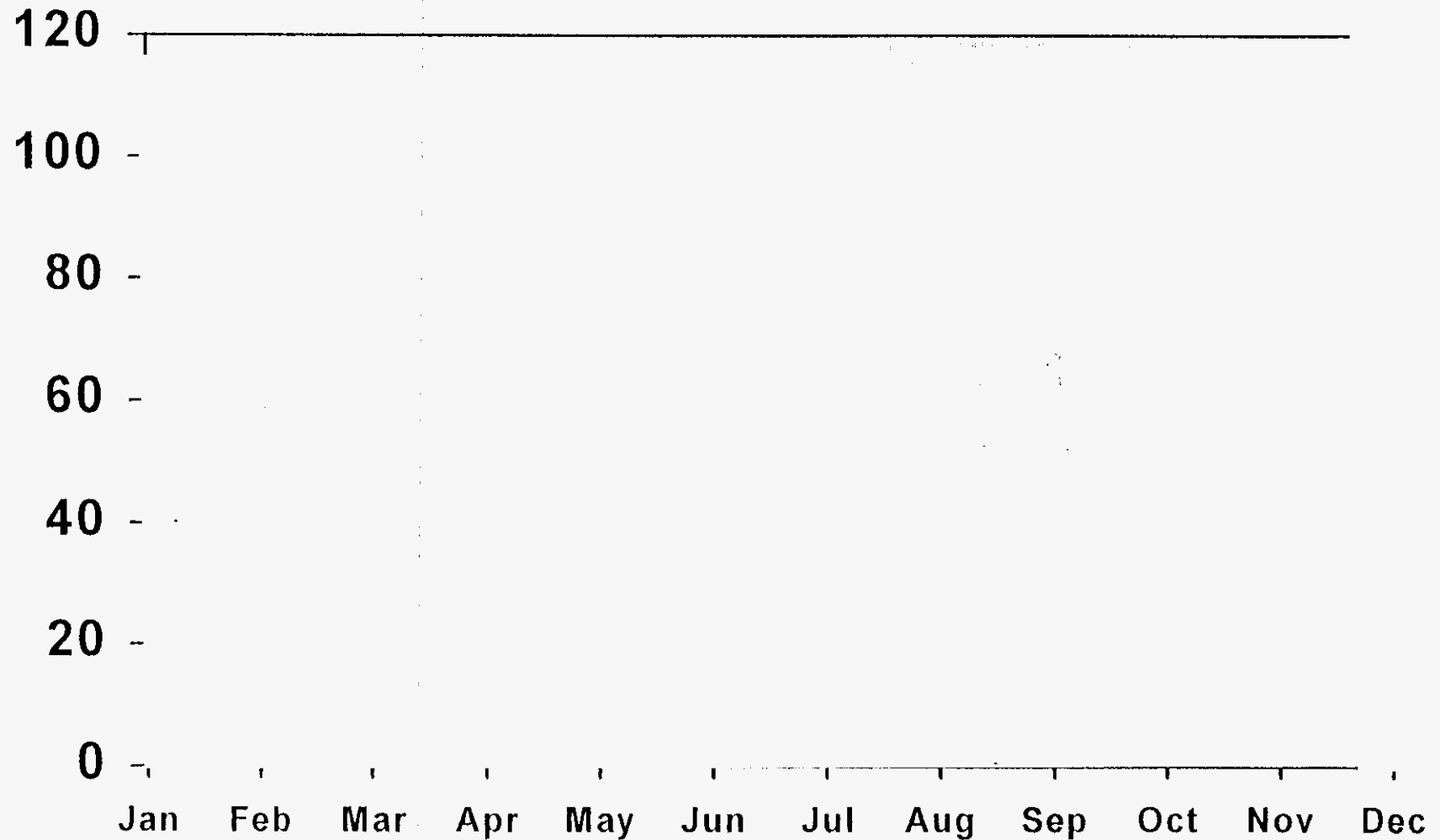
1997 MAINTENANCE RESULTS



Teleport Communications Failure Frequency

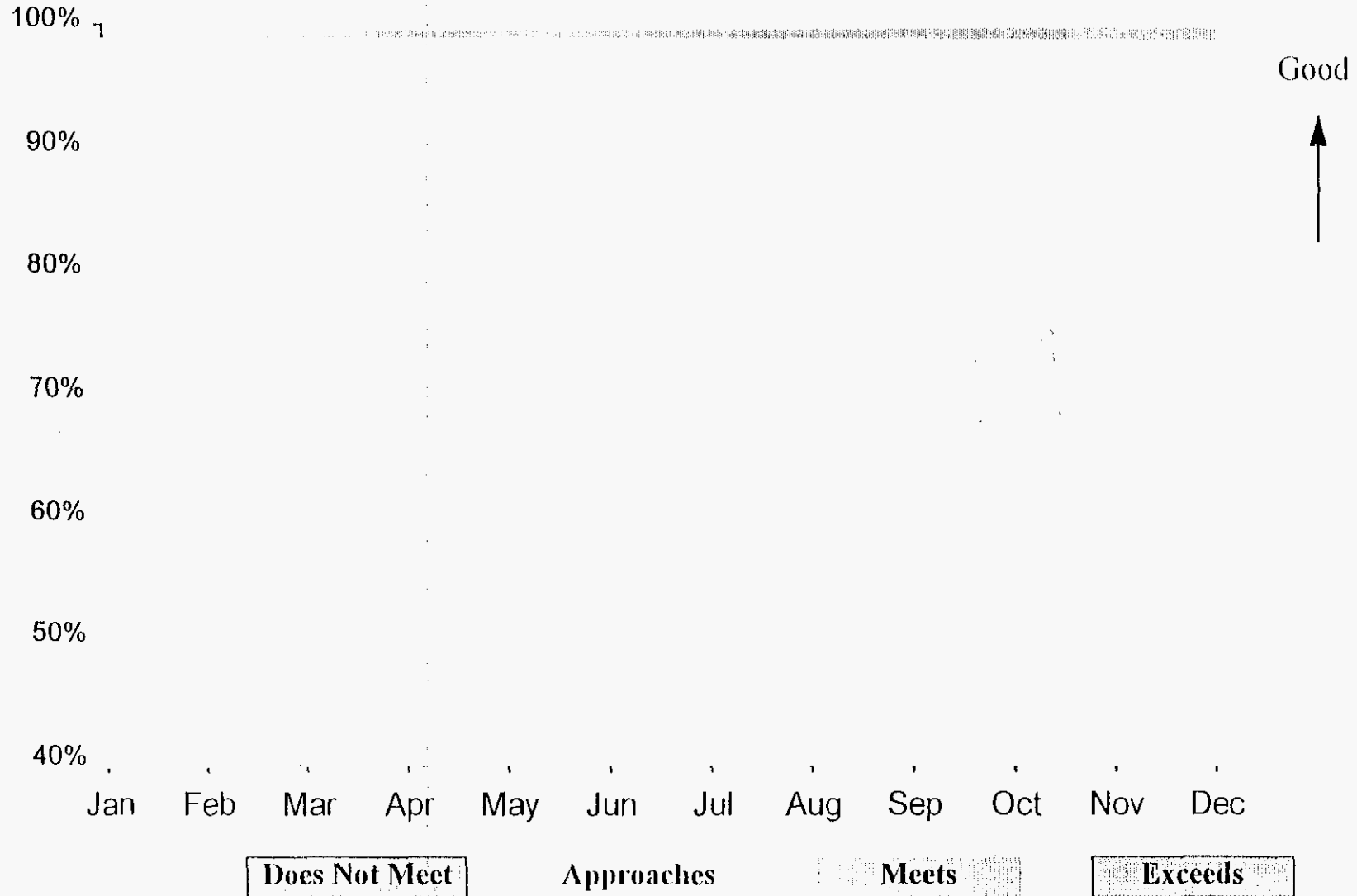


Teleport Communications Trouble Ticket Volume

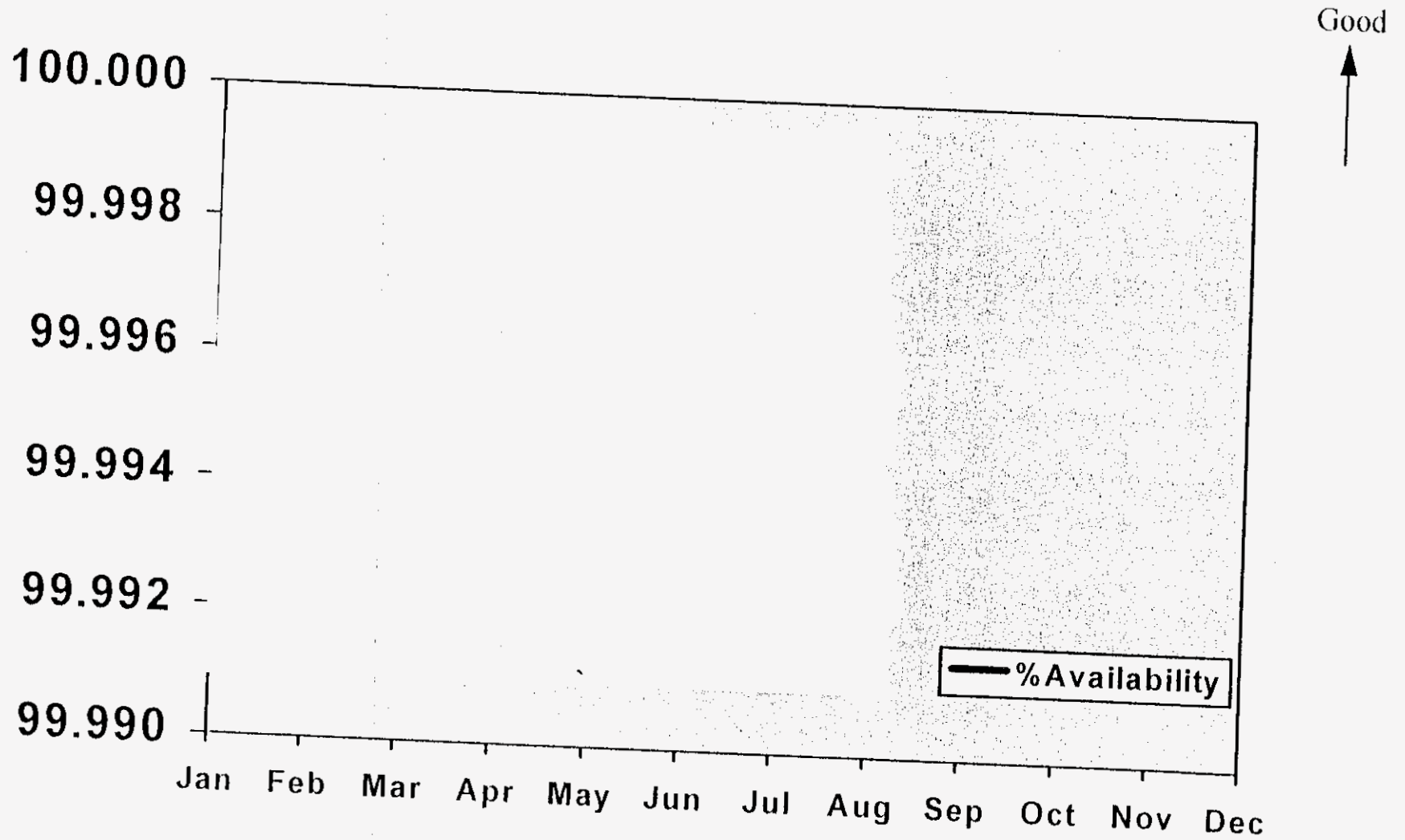


Teleport Communications 1997 Time to Restore

Percent < 3 Hours



Teleport Communications Percent Availability



PERFORMANCE MONITORING

OF

THE

UNITED STATES DEPARTMENT OF THE INTERIOR

UNITED STATES DEPARTMENT OF THE INTERIOR

WHAT DO WE DO ?

- We monitor DS1 circuits (non-channelized).
- Two PM Groups. (Atlanta ACAC and Birmingham ACAC)
- GENERAL CENTER - As of 5/31/97 we were pulling PM data on approximately circuits.
- TPM - As of 5/31/97 we were pulling PM data on circuits.

HISTORY

- PM Groups were formed approximately 2 years ago.
- Circuit Base that we monitor has grown since October 1996.

WHAT KIND OF PM DATA DO WE HAVE AVAILABLE ?

- 31 Days or more
- 1 Day
- Since Midnight the previous night.
- Current (15 minute increments)

HOW IS PERFORMANCE MEASURED ?

- Hekimian System (PMI Performance Monitoring Integrator)
- PMI polls network elements nightly
- Quality Index

$$\text{QI} = \frac{86400 - (\text{ES} + \text{SES} + \text{UAS})}{86400 \text{ (total sec. per day)}} \times 100$$

ES = Errored Seconds

SES = Severely Errored Seconds

UAS = Unavailable Seconds

HOW CAN WE HELP ?

- **PROACTIVELY** - By monitoring circuits that are degrading on a daily basis we can potentially save a Customer Report (CR) from ever being opened. This is accomplished with assistance from the IC and their end user.
- **REACTIVELY** - PM Data can be pulled on DS1's that are reported to the Maintenance Groups in the ACAC.

FUTURE GOALS

- **CONTINUED GROWTH** - Increase circuit base that we now monitor (new and existing).
- **NETWORK RELIABILITY** - Provide the best and most reliable network for BellSouth Customers.

REQUEST: Please provide the number of unbundled local loops ordered by TCG South Florida; the number of loops provided by BellSouth and the number of loops provided by BellSouth to TCG South Florida that are operational.

RESPONSE: TCG South Florida utilizes the following BellSouth purchased/leased facilities:

- Outgoing Tandem Trunks:
- Meet-Point Billing (Two-Way) Trunks used for IXC Access:
- Local Serving Office (Outgoing) Trunks:
- Unbundled Loops in Service:

THIS RESPONSE CONTAINS CONFIDENTIAL AND PROPRIETARY INFORMATION

REQUEST: Please provide the names of resellers and STS providers that may be providing residential service over TCG South Florida's facilities.

RESPONSE:

THIS RESPONSE CONTAINS PROPRIETARY AND CONFIDENTIAL INFORMATION