RUTLEDGE, ECENIA, UNDERWOOD, PURNELL & HOFFMAN FUE COPY

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GOVERNMENTAL CONSULTANTS PATRICK R. MALDY AMY J. YOUNG

TELEPHONE (850) 681-6788 TELECOPIER (850) 681-6515

September 17, 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

In re: Florida Public Service Commission Staff Data Requests concerning status of Re: local exchange competition - undecketed

Dear Ms. Bayo:

SEC

WAS _

OTH

Enclosures

	Enclosed	herewith	for filing	g in the	above-referenced	docket	on	behalf	of	Teleport
	Communications	Group Inc	("TCG"	are the	following documen	its:				
53512	1/									

Original and fifteen copies of TCG's Notice of Intent to Request Confidential AFA — Classification for Response to Staff Data Request; and APP An envelope containing a copy of the material considered confidential. CAF CMU_ Sincerely, CTR ____ EAG ____ LEG _ LIN 09463-97 OPC __KAH/rl RECEIVED A FILED RCH

This document has been placed in confidential storage pending advice on handling from OPR staff.

Martha Carter Brown, Esq. DOCUMENT NUMBER-DATE Ms. Laura King 09462 SEP 175

FPSC-RECORDS/REPORTING

ORIGINAL FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Public Service Commission) Staff Data Requests concerning status of)	
local exchange competition.	Undocketed
	Filed: September 17, 1997

TELEPORT COMMUNICATIONS GROUP INC.'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION FOR RESPONSE TO STAFF DATA REQUEST

Teleport Communications Group Inc. ("TCG"), by and through its undersigned counsel, and pursuant to Rule 25-22.006(3)(a) and (5)(a), Florida Administrative Code, hereby files its Notice of Intent to Request Confidential Classification for TCG's Response to the Florida Public Service Commission Staff's September 11, 1997 data request in the above-referenced matter.

- By letter dated September 11, 1997, the Staff of the Florida Public Service
 Commission requested TCG to provide exchange-specific data reflecting the number of business and residential access lines served by TCG in Florida. A copy of Staff's September 11 data request is attached hereto as Exhibit A.
- 2. TCG maintains that the requested information is confidential and proprietary.
 TCG has filed this Notice of Intent to Request Confidential Classification to permit Staff to take possession of this confidential and proprietary information without delay. A copy of TCG's response with the confidential information highlighted is enclosed herewith as Exhibit B. Two copies of TCG's response with the confidential information redacted are attached as Exhibit C.

DOCUMENT NUMBER-DATE

09462 SEP 175

FPSC-RECORDS/REPORTING

TCG will seek continued confidential handling of this information by filing a

Request for Confidential Classification within twenty-one days.

Respectfully submitted,

KENNETH A. FROFFMAN, ESQ. WILLIAM B. WILLINGHAM, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551
Tallahassee, FL 32302
(850) 681-6788 (Telephone)
(850) 681-6515 (Fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Teleport Communications Group Inc.'s Notice of Intent to Request Confidential Classification for Response to Staff Data Request was furnished by hand delivery to the following this 17th day of September, 1997:

Martha Carter Brown, Esq. Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Gerald Gunter Building Tallahassee, FL 32399

Ms. Laura King Florida Public Service Commission 2540 Shumard Oak Boulevard Room 270A Gerald Gunter Building Tallahassee, FL 32399

CENNETH A HOPMAN, ESQ



DIVISION OF COMMUNICATIONS WALTER D'HAESELEER DIRECTOR; (850) 413-6600

Public Service Commission

September 11, 1997

Mr. Ken Hoffman P.O. Box 551 Tallahassee, Fl. 32302-0551

RE: TCG South Florida

Dear Mr. Hoffman:

Thank you for your response to our June 5, 1997, data request regarding local exchange competition. After reviewing the responses received, it was determined that in order to meet our statutory obligations, additional information is necessary. Therefore, please respond to the attached follow-up data request no later than September 17, 1997. If there are any questions, please contact Jeff Griswold at (850)413-6544 or Laura King at (850)413-6588.

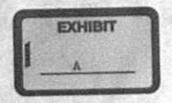
Sincerely.

Walter D'Haeseleer

Director

Division of Communications

noossalines.lvk



September 11, 1997- Follow-up Data Request

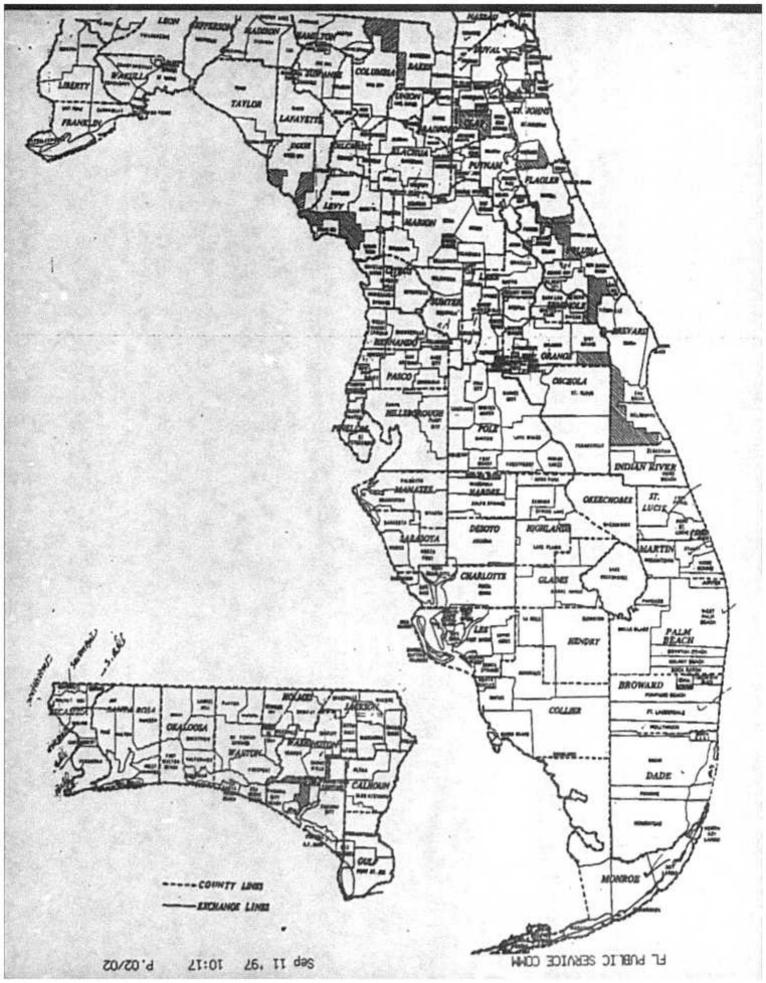
For purposes of the following questions, please refer to the exchange map attached.

- For each exchange where you are providing local service, please identify, by exchange, the number of business access lines served. (see example below)
- For each exchange where you are providing local service, please identify, by exchange, the number of residential access lines served. (see example below)

EXAMPLE

Miami Exchange: Business Access Lines - 25 Residential Access Lines - 0
Tampa Exchange: Business Access Lines - 60 Residential Access Lines - 35
Naples Exchange: Business Access Lines - 39 Residential Access Lines - 0

Your response may be faxed to Laura King at (850)413-6589 or Jeff Griswold at (850)413-6545.



TCG'S RESPONSE TO STAFF'S SEPTEMBER 11 DATA REQUEST CONCERNING STATUS OF LOCAL EXCHANGE COMPETITION

1) Number of TCG business access lines by rate center as of August, 1997:

Rate Center

Number of business access lines

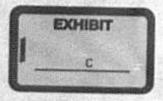


TOTAL



2) TCG serves no residential access lines at this time. TCG is aware, however, of at least one reseller, Optel, offering residential service over TCG's facilities. From TCG's perspective, Optel is a business customer purchasing business services.

TCG.a



TCG'S RESPONSE TO STAFF'S SEPTEMBER 11 DATA REQUEST CONCERNING STATUS OF LOCAL EXCHANGE COMPETITION

1) Number of TCG business access lines by rate center as of August, 1997:

Rate Center

TOTAL

Number of business access lines



2) TCG serves no residential access lines at this time. TCG is aware, however, of at least one reseller, Optel, offering residential service over TCG's facilities. From TCG's perspective, Optel is a business customer purchasing business services.

TCG.a