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June 9, 1998

**ORIGINAL**

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: In re: April 13, 1998 Data Request served by Florida Public Service Commission staff concerning the provision of unbundled network elements and the status of local exchange competition **960786-TL**

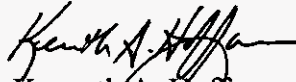
Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc./TCG South Florida ("TCG") are the original and fifteen copies of TCG's Request for Confidential Classification of Responses to April 13, 1998 Staff Data Request.

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,

  
Kenneth A. Hoffman

ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
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Enclosures  
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RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

(05702-98)  
DOCUMENT NUMBER-DATE

06147 JUN-98

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**ORIGINAL**

In re: April 13, 1998 Data Request )  
served by Florida Public Service )  
Commission Staff concerning the )  
provision of unbundled network )  
elements and the status of local )  
exchange competition. )  
\_\_\_\_\_ )

960786 -

Filed: June 9, 1998

**TELEPORT COMMUNICATIONS GROUP INC./  
TCG SOUTH FLORIDA'S REQUEST FOR  
CONFIDENTIAL CLASSIFICATION OF RESPONSES TO  
APRIL 13, 1998 STAFF DATA REQUEST**

Teleport Communications Group Inc. and its Florida affiliate, TCG South Florida, referred to herein collectively as "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 TCG's Responses to Staff's April 13, 1998 data request. TCG filed its confidential responses with a Notice of Intent to Request Confidential Classification on May 22, 1998. In support of this Request, TCG states as follows:

1. On May 22, 1998, TCG provided information to Staff concerning the number of business subscribers and the number of business subscriber lines TCG serves in Florida. This information directly relates to TCG's competitive interests. Disclosure of this information would impair TCG's competitive business interests by informing competitors of the number of business subscribers and the number of business subscriber lines served by TCG in Florida. 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 (1997). The Commission previously has determined that this

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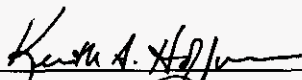
FPSC-RECORDS/REPORTING

type of information is entitled to the protection of Section 364.181(3), Florida Statutes (1997). See Order No. PSC-97-1039-CFO-TL and Order No. PSC-1392-CFO-TL, issued in Docket No. 960786-TL.

2. 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 (1997).

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

Respectfully submitted,

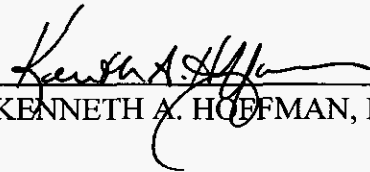
  
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(850) 681-6515 (fax)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of foregoing was furnished by hand delivery to the following this 9th day of June, 1998:

Martha Carter Brown, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 370  
Tallahassee, FL 32399-0850

Ms. Mary Rose Sirianni  
Division of Communications  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Room 282A  
Tallahassee, FL 32399-0850

  
\_\_\_\_\_  
KENNETH A. HOFFMAN, ESQ.