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ORIGINAL

September 3, 1998

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

Re: Docket No. 980696-TP
Determination of the cost of basic local telecommunications service,
pursuant to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification regarding information included in its responses to AT&T's First Set of Interrogatories in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC 1 A part of GTE Corporation
WAS _____
OTH all to Matilda

Very truly yours,

Kimberly Caswell

KC:tas

Enclosures

09612-98
DOCUMENT NUMBER-DATE

09649 SEP-4 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of)
Basic Local Telecommunications)
Service, Pursuant to Section 364.025,)
Florida Statutes)

Docket No. 980696-TP
Filed: September 3, 1998

ORIGINAL

**GTE FLORIDA INCORPORATED'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTE) seeks confidential classification and a protective order for certain information included in its responses to AT&T Communications of the Southern States, Inc.'s First Set of Interrogatories, filed on August 13, 1998, and also given to Commission Staff. (GTE filed a Notice of Intent to Request Confidential Classification for these items at that time, and the information is also covered under a protective agreement between GTE and AT&T.) While a ruling on the Request is pending, GTE understands that the information at issue is exempt from Florida Statutes section 119.07(1), and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). A highlighted, unredacted copy of the confidential material is attached to this request as Exhibit A. Redacted copies of the confidential material are attached as Exhibit B.

ACK _____ All of the information for which GTE seeks confidential treatment falls within Florida
AFA _____
APP _____ Statutes section 364.183(3)(e), which defines the term, "proprietary confidential business
CAF _____ information," to include "information relating to competitive interests, the disclosure of
CMU _____
CTR _____ which would impair the competitive business of the provider of information." If the
EAG _____ information at issue were publicly disclosed, it would allow competitors to tailor their
LEG _____
LIN _____ marketing, entry and expansion plans accordingly, avoiding much of the trial and error that
OPC _____
RCH _____
SEC _____
WAS _____
OTU _____

DOCUMENT NUMBER-DATE

09649 SEP-4 88

REGISTRATION

is the hallmark of an openly competitive marketplace. In addition, some of the information covered by this Request is considered to be proprietary and confidential by GTE's third-party vendors, as well as by GTE.

In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer. As such, it is essential for the Commission to afford confidential treatment to the information described below in the following line-by-line justification of confidentiality required by the Commission.

Please note that the numbers shown on page 10 of the interrogatory responses (related to SCIS switching inputs), and the numbers on Bates stamped pages 13 and 14 (road feet weighting by zone) which were shown as confidential in GTEFL's Notice of Intent, are not now deemed confidential.

TEXT

Page 13, lines 1-8, columns C-E: This information shows the utilization of copper and fiber feeder and distribution cable and digital loop carrier in GTE's network for 1997 and 1998. Terminated, working, and percent working categories are shown. This engineering and fill information would be useful to a competitor designing its own network or trying to discern GTE's vulnerabilities in terms of current network engineering.

BATES-STAMPED ATTACHMENT

Page 0000001, lines 1-46, columns B-G; Page 0000002, lines 47-89, columns B-G: These documents show average loop length by kilohertz band for each central office.

including overall average figures for each office. These engineering data would be useful to a competitor, particularly a facilities-based competitor, designing its own network. They would help GTE's competitors determine which areas might be more profitable to serve and where GTE might be most vulnerable to competition. Any information that is location-specific, customer-specific, or that can be interpreted to show relative demand is considered by GTE to be competitively sensitive, susceptible to use by competitors in ways that sometimes cannot be anticipated with certainty.

Page 0000003, lines 1-45, columns B-D; page 0000004, lines 46-89, columns B-D:

These are GTE's route footage numbers by construction type (aerial, buried, and underground) for each central office. These engineering data could be useful to a competitor, particularly a facilities-based competitor, in designing its own network, as well as discerning what locations might be more relatively cost-effective to service. Any information that is location-specific, customer-specific, or that can be interpreted to show relative demand is considered by GTE to be competitively sensitive, susceptible to use by competitors in ways that sometimes cannot be anticipated with certainty.

Page 0000011, lines 1-3, columns C-E: This page shows Florida residential additional line penetration for December of 1995, 1996, and 1997, respectively, broken into residential primary lines, residential additional lines, and average lines per residential customer. The market for additional access lines is intensely competitive, and growing ever more so with the entry of new competitors into the local market. Disclosure of these data would help competitors to determine the size of the market to be served in GTE's existing service territory, and what percentage of GTE's customers have second lines.

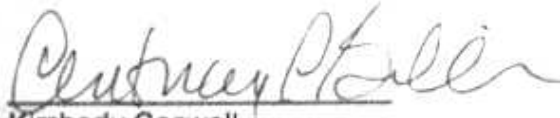
Page 0000012, lines 1-2, columns A-I: This table shows GTE's average repair and maintenance costs per fiber and copper occurrence, divided into direct semi-variable costs, technician costs, and other variable costs. These sensitive cost data would allow a competitor to determine how best to configure its own network to compete with GTE, and areas of particular vulnerability in GTE's cost structure.

Page 0000015, lines 1-21, columns B-F: This page shows the weighting by road feet for various tasks under GTE's contracts with various vendors. These contracts forbid GTE to publicly disclose anything about their terms. Such disclosure could harm GTE's business relationships, disrupt the vendors' relationships with their other clients (both actual and potential), cause GTE's vendors to cease service provision under the contracts, and subject GTE to possible litigation.

Page 0000016, lines 1-20, columns B-C: This page shows the weighted average cost for various tasks in GTE's single-source provider contracts. Please see the justification given above for page 0000015. In addition, if the weighted average cost of a particular task were disclosed, particular vendors would know if they were above or below the average and use that knowledge in negotiations with GTE.

Respectfully submitted on September 3, 1998.

By:


Kimberly Caswell
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Telephone: 813/483-2617

Attorney for GTE Florida Incorporated

GTE Florida's Responses and Objections
to AT&T's 1st Set of Interrogatories
Page 13

25. Identify the number and percentage of defective copper feeder and distribution cable pairs and fiber strands for each of the past ten years.

Response:

GTEFL objects to this Interrogatory because producing information for the past ten years is unduly burdensome. GTEFL will produce the requested information for 1997, which is the only period relevant to this proceeding. For Florida in 1997, the number of pairs was 11,958,919. The number of bad pairs was 347,267. The percentage bad was 2.9%. The information for prior years is not available.

Prepared By: Ellen Sassani
Title : Senior Systems Engineer

26. Describe the utilization of copper and fiber feeder and distribution cables and digital loop carrier (e.g., percentage of total pairs or strands in use) for each of the past ten years. Please define what is in the numerator and denominator of the utilization data.

Response:

GTEFL objects to this Interrogatory because producing information for the past ten years is unduly burdensome. GTEFL will produce the requested information for 1997 and 1998, which is the only period relevant to this proceeding. The information contained in this response is confidential in nature and is being provided in accordance with the terms of the nondisclosure agreement previously executed by AT&T.

	A	B	C	D	E
	1998	Type	Terminated	Working	Percent Working
1		Feeder			
2		Isolated			
3		DLC			
4		Dual Line			
	1997	Type			
5		Feeder			
6		Isolated			
7		DLC			
8		Dual Line			

CONFIDENTIAL

A B C D E F G

AVERAGE LOOP LENGTH BY KILOFOOT BAND

PLANT LOCN CODE	CENTRAL OFFICE NAME	AVERAGE LOOP LENGTH					OVERALL AVERAGE KF
		0-12 KF	12-18 KF	18-24 KF	24-30 KF	>30 KF	
1	1211 SULPHUR SPRINGS						
2	1212 TEMPLE TERRACE						
3	1217 CARROLLWOOD						
4	1219 UNIVERSITY						
5	1411 TAMPA WESTSIDE						
6	1415 SWEETWATER						
7	1461 BEACH PARK						
8	1611 TAMPA MAIN						
9	1612 YBOR CITY						
10	1615 SEMINOLE						
11	1712 WALLCRAFT						
12	1717 HYDE PARK						
13	2114 LEALMAN						
14	2215 NORTH GULF BEACH						
15	2218 BAYOU						
16	2313 PASADENA						
17	2411 ST. PETERSBURG MAIN						
18	2417 SKYWAY						
19	4111 SARASOTA MAIN						
20	5111 LARGO						
21	5112 PINELLAS						
22	5113 INDIAN ROCKS						
23	5211 CLEARWATER						
24	5213 COUNTRYSIDE						
25	5215 DUNEDIN						
26	5217 ST. GEORGE						
27	1218 LAND O LAKES						
28	1713 BAYSHORE						
29	3122 ALTURAS						
30	3132 BRADLEY						
31	3233 INDIAN LAKES						
32	3234 LAKE WALES EAST						
33	3241 FROSTPROOF						
34	3251 POLK CITY						
35	4113 ST. ARMANDS KEY						
36	4222 PARRISH						
37	4231 MYAKKA						
38	1213 LUTZ						
39	1214 WESLEY CHAPEL						
40	1215 THONOTOSASSA						
41	1313 BRANDON						
42	1314 ALAFIA						
43	1315 RUSKIN						
44	1316 TAMPA EAST						
45	1317 WIMAUMA						
46	1414 OLDSMAR						

A

B

C

D

E

F

G

AVERAGE LOOP LENGTH BY KILOFOOT BAND

PLANT LOCN CODE	CENTRAL OFFICE NAME	AVERAGE LOOP LENGTH					OVERALL AVERAGE KF
		0-12 KF	12-18 KF	18-24 KF	24-30 KF	>30 KF	

47 1418 KEYSTONE
 48 2123 GANDY
 49 2127 FEATHER SOUND
 50 2312 SOUTH GULF BEACH
 51 2416 ST. PETERSBURG SOUTH
 52 3111 LAKELAND MAIN
 53 3112 HIGHLANDS
 54 3113 LAKELAND NORTH
 55 3115 LAKELAND EAST
 56 3121 BARTOW
 57 3131 MULBERRY
 58 3211 WINTER HAVEN
 59 3212 LAKE ALFRED
 60 3215 CYPRESS GARDENS
 61 3221 AUBURNDALE
 62 3231 LAKE WALES MAIN
 63 3232 BABSON PARK
 64 3261 HAINES CITY MAIN
 65 3262 HAINES CITY NORTH
 66 3263 DUNDEE
 67 3611 PLANT CITY
 68 3612 PINECREST
 69 3623 ZEPHYRHILLS
 70 4112 SARASOTA NORTHSIDE
 71 4114 SARASOTA SOUTHSIDE
 72 4117 SARASOTA SPRINGS
 73 4118 LONGBOAT KEY
 74 4119 SIESTA KEY
 75 4211 BRADENTON MAIN
 76 4212 ANNA MARIA
 77 4214 BRADENTON BAY
 78 4215 PALMA SOLA
 79 4221 PALMETTO
 80 4311 VENICE MAIN
 81 4312 OSPREY
 82 4313 VENICE SOUTH
 83 4321 ENGLEWOOD
 84 4331 NORTH PORT
 85 5311 TARPON SPRINGS
 86 5321 NEW PORT RICHEY
 87 5322 SEVEN SPRINGS
 88 5331 HUDSON
 89 5332 MOON LAKE

ROUTE FOOTAGE BY CONSTRUCTION TYPE

A

B

C

D

PLANT LOCN CODE	CENTRAL OFFICE NAME	AERIAL ROUTE FEET	BURIED ROUTE FEET	UNDERGROUND ROUTE FEET
-----------------------	---------------------	----------------------	----------------------	---------------------------

46	3221 AUBURNDALE			
47	3231 LAKE WALES MAIN			
48	3232 BABSON PARK			
49	3233 INDIAN LAKES			
50	3234 LAKE WALES EAST			
51	3241 FROSTPROOF			
52	3251 POLK CITY			
53	3281 HAINES CITY MAIN			
54	3282 HAINES CITY NORTH			
55	3283 DUNDEE			
56	3811 PLANT CITY			
57	3812 PINECREST			
58	3825 ZEPHYRHILLS			
59	4111 SARASOTA MAIN			
60	4112 SARASOTA NORTHSID			
61	4113 ST. ARMANDS KEY			
62	4114 SARASOTA SOUTHSID			
63	4117 SARASOTA SPRINGS			
64	4118 LONGBOAT KEY			
65	4119 SIESTA KEY			
66	4211 BRADENTON MAIN			
67	4212 ANNA MARIA			
68	4214 BRADENTON BAY			
69	4215 PALMA SOLA			
70	4221 PALMETTO			
71	4222 PARRISH			
72	4231 MYAKKA			
73	4311 VENICE MAIN			
74	4312 OSPREY			
75	4313 VENICE SOUTH			
76	4321 ENGLEWOOD			
77	4331 NORTH PORT			
78	5111 LARGO			
79	5112 PINELLAS			
80	5112 INDIAN ROCKS			
81	5211 CLEARWATER			
82	5213 COUNTRYSIDE			
83	5215 DUNEDIN			
84	5217 ST. GEORGE			
85	5311 TARPON SPRINGS			
86	5321 NEW PORT RICHEY			
87	5322 SEVEN SPRINGS			
88	5331 HUDSON			
89	5332 MOON LAKE			

Florida Residential Additional Line Penetration

<i>A</i>	<i>B</i>	<i>C</i>	<i>D</i>	<i>E</i>
	Total Residential Lines	Residential Primary Lines	Residential Additional Lines	Average Lines per Residential Customer
1	Dec 1985	1,480,589		
2	Dec 1986	1,519,541		
3	Dec 1987	1,588,215		

CONFIDENTIAL

GTE CONFIDENTIAL

0000011

Fiber and Copper Costs per Occurance For GTE Florida

The following table shows the average repair and maintenance costs per fiber and copper occurrence as coded in the GTE positive time recording database. The average costs were divided between Direct Semi-Variable Costs, Technician Costs, and other variable costs.

	A	B	C	D	E	F	G	H	T
Technician Cost									
Technician Cost / Occurance									
Other Variable Cost / Occurance									
DSV Cost / Occur									
Total Cost / Occurance									

CONFIDENTIAL

0000012

3rd PARTY
CONFIDENTIAL

HIGHLY SENSITIVE

CONFIDENTIAL

INFORMATION RESTRICTED

FLORIDA Single Source Provider Contracts
SSP Unit Cost Weighting

A

Weighting by road feet

1	LP01A	Placing pole
2	LP03A	Replaces LP01A for shared pole
3	LP07A	Place anchor & guy
4	LP18A	Place strand
5	LP22A	Place aerial cable
6	LP28A	Place xconnect
7	LP28D	Place xconnect pad
8	LP43A	Place copper cable in conduit
9	LP43C	Place fiber cable in conduit
10	LP49A	Place cable/duct direct
11	LP49B	Place additional cable/duct
12	LP50A	Place buried drop
13	LP70A	Cut solid rock - per hole
14	LP73A	Splice pit
15	LS02A	Straight splice 1-50 pairs
16	LS02B	Straight splice 51-300 pairs
17	LS02C	Straight splice > 300 pairs
18	LS14B	Place Mid (less than 6)
19	LS50A	Splice fiber - 48 fibers or less
20	LS50B	Splice fiber > 48 fibers
21	LS72A	Manhole setup for use

B

C

D

E

F

Weighted Avg.

Contractor A Zone 1	Contractor B Zone 2	Contractor C Zone 3	Contractor D Zone 4
24.79%	27.63%	24.63%	23.08%
SSP Unit Rate			

CONFIDENTIAL

The following items from FLORIDA Single Source Provider Contracts were used in our BCPM filings for USF

	Weighting by road feet A	Weighted Ave. B	Where used C
1	LP01A	Placing pole	
2	LP03A	Replaces LP01A for shared pole	
3	LP07A	Place anchor & guy	
4	LP18A	Place strand	
5	LP22A	Place aerial cable	
6	LP28A	Place xconnect	
7	LP28D	Place xconnect pad	
8	LP43A	Place copper cable in conduit	
9	LP43C	Place fiber cable in conduit	
10	LP48A	Place cable/duct direc:	
11	LP50A	Place buried drop	
12	LP70A	Cut solid rock - per hole	
13	LP73A	Splice pit	
14	LS02A	Straight splice 1-50 pairs	
15	LS02B	Straight splice 51-300 pairs	
16	LS02C	Straight splice + 300 pairs	
17	LS14B	Place Nid (less than 6)	
18	LS50A	Splice fiber - 48 fibers or less	
19	LS50B	Splice fiber > 48 fibers	
20	LS72A	Manhole setup for use	

Note: In BCPM inputs only the total costs are used and these are the sum of material and labor costs.
The costs mentioned above were used to calculate the labor component of the total costs.

*****GTE RESTRICTED*****

Non-Disclosure agreement required for access.

CONFIDENTIAL

0000016

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification regarding its responses to AT&T's First Set of Interrogatories in Docket No. 980596-TP were sent via U.S. mail on September 3, 1998 to the parties on the attached list.



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