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ORIGINAL

September 8, 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 Staff's First Request for Production of Documents 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.

Very truly yours,

Kimberly Caswell

KC:tas
Enclosures

A part of GTE Corporation

RECEIVED & FILED

EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09720 SEP-8 88

EPSC-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 8, 1998

**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 Staff's First Request for Production of Documents, filed on August 17, 1998 (GTE filed a Notice of Intent to Request Confidential Classification for these items at that time.) 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). GTE already submitted (1) a highlighted/unredacted copy and (2) a redacted copy of this confidential information with its earlier Notice of Intent.

All of the information for which GTE seeks confidential treatment falls within Florida Statutes section 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 information." If the information at issue were publicly disclosed, it would allow competitors to tailor their marketing, entry and expansion plans accordingly, avoiding much of the trial and error that 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-

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REGISTRATION/REPORTING

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 justification of confidentiality.

AT&T's First Request for Production of Documents

Bates-stamped pages 18-86. This document is GTE's infrastructure provisioning guidelines for maintenance, obligatory, and normal growth funding. Also included are considerations of the impacts of open market transition, maintenance and operating improvements, business case development, and selected technologies. It contains detailed information on network planning and design, planned and reactionary projects, growth relief triggers, technology implementation assessments, and deployment and provisioning guidelines for numerous components. Public disclosure of this comprehensive information about GTE's strategies for maintaining and building out its network would help GTE's competitors, both actual and potential, know how to design their own networks to best compete with GTE. These data would, moreover, help GTE's competitors understand and anticipate GTE's likely responses to competitive entry and expansion, thus allowing an unfair market advantage. (Because of the nature of the document, it is impossible to divide it into line and column numbers; the only plausible way

to maintain its confidentiality is to consider the entire document (past the cover page) confidential.)

Bates-stamped pages 130-178. This document sets forth GTE's practices to be followed for the negotiations with joint pole users, structural coordination-height and boundary limitations at airports, specifications for communication lines crossing the tracks of railroads, and for guidelines for use after contract execution. Among other things, it discloses GTE's rationale for taking particular negotiating positions, and establishes detailed contract specifications to be followed. This document, if disclosed, would give entities with which GTE must contract for joint pole use an advantage over GTE in negotiations. Such entities will know GTE's objectives and rationale for contract negotiations, thus enabling them to obtain more favorable terms from GTE than they otherwise would. In addition, as a general matter, GTE considers all of its internal practices and operating procedures to be confidential. As noted above, any information gained from the company can be used by competitors in ways that GTE cannot fully anticipate. (Because of the nature of the document, it is impossible to divide it into line and column numbers; the only plausible way to maintain its confidentiality is to consider the entire document confidential.)

AT&T's Second Request for Production of Documents

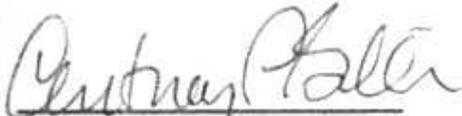
Bates-stamped pages 220, lines 1211-3131, columns C-T; page 221, lines 3132-5213, columns C-T; page 222, lines 5215-5332, columns C-T; page 223, lines 1211-4113,

columns C-K, page 224, lines 4114-5332, columns C-K. These documents show GTE's mix of feeder and distribution by central office. Feet and section statistics are given, along with percentages associated with the structural mix for each office. This type of detailed, geography-specific information about GTE's network could give competitors, particularly facilities-based competitors, useful guidance in designing their own networks and in knowing what areas might be relatively more cost-effective to serve.

FCTA's Second Request for Production of Documents

Pages 1-133, all lines, last column. This is a detailed history of GTE's switched and special access lines for the past three years (1995-1997). These pages show, for each central office, the number of units for over 20 types of local exchange services. This information would be extremely helpful to a competitor in discerning demand and demand trends, by central office, for all of these services. The competitor could then know, without the usual market trial and error, where entry and/or expansion would likely be most profitable, and where it could best compete successfully with GTE. This kind of access line information is routinely granted confidential protection by this Commission.

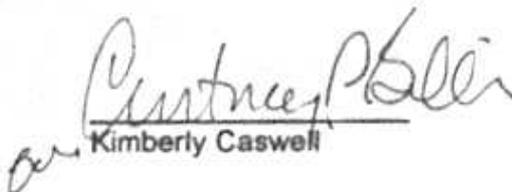
Respectfully submitted on September 8, 1998.

By: 
or Kimberly Caswell
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Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification regarding its responses to Staff's First Request for Production of Documents in Docket No. 980696-TP were sent via U.S. mail on September 8, 1998 to the parties on the attached list.



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