

GTE SERVICE CORPORATION

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September 29, 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 Second Request for Production of Documents (Bates-stamped page 3075A) filed in the above matter on September 8. 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.

AFA \_\_\_\_\_\_Very truly yours,

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Kimberly Caswell

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A part of GTE Corporation

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of	)	Docket No. 980696-TP
Basic Local Telecommunications	)	
Service, Pursuant to Section 364.025,	)	Filed: September 29, 1998
Florida Statutes	)	

## 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 response to item 8 of the Staff's Second Request for Production of Documents (Batesstamped page 3075A), filed on September 8, 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." The document at issue reveals the access line gain for a number of switched and special access services over the past four years and forecasts line gains until 2004. This information, if publicly disclosed would allow competitors to know how popular certain of GTE's services have been and, perhaps more importantly, how much growth GTEFL forecasts for the future.

These data would help competitors to tailor their marketing, entry and expansion plans to ensure their success without the trial and error that is the hallmark of an openly competitive marketplace. It is, moreover, unfair to allow competitors to use, free of charge, the marketing intelligence GTE has developed at substantial cost.

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, designated by lines 1-52 and columns C-M.

Respectfully submitted on September 29, 1998.

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Kimberly Caswell

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