

GTE SERVICE CORPORATION

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Certified in Florida as Authorized House Counsel

October 28, 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. Bavo

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification regarding information included in GTE witness Allen E Sovereign's late-filed deposition Exhibit 2 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 Kimberly Caswell

KC tas Enclosures

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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 Basic Local Telecommunications Service, Pursuant to Section 364 025, Florida Statutes

Docket No. 980696-TP Filed: October 28, 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 GTE witness Allen E. Sovereign's late-filed deposition Exhibit 2 (GTEFL Forecast of Additions and Retirements for 1998-2000). (GTE filed a Notice of Intent to Request Confidential Classification for these items on October 7, 1998.) 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 25-22 005(3)(d). A redacted copy and a highlighted, unredacted copy of the confidential material were attached to the Notice of Intent

The information for which GTE seeks confidential classification is the plant additions and retirements numbers forecasted for 1998, 1999, and 2000. These numbers appear on page 1 of 1, under all of the "additions" and "retirements" headings on the page. All of this information 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, competitors would be better able to know how aggressive GTE's expansions and retirements will be,

thereby helping them make their own entry and expansion decisions. This would be an unfair advantage, helping GTE's actual and potential competitors avoid much of the trial and error that is the hallmark of an openly competitive marketplace.

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 above

Respectfully submitted on October 28, 1998

o Kimberly Caswell

Post Office Box 110, FLTC0007

Tampa, Florida 33601 Telephone, 813/483-2617

Attorney for GTE Florida Incorporated

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification regarding Allen E. Sovereign's late-filed deposition Exhibit 2 in Docket No. 980396-TP were sent via U.S. mail on October 28, 1998 to the parties on the attached list.

Bukimberly Caswell

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