



Kimberly Caswell
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GTE SERVICE CORPORATION
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Tampa, Florida 33601-0110
813-483-2606
813-204-8870 (Facsimile)

February 1, 2000

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

ORIGINAL

RECEIVED - FPSC
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RECORDS AND REPORTING

000105-TL

Re: Undocketed
Joint FCC/State Affiliate Transaction Audit
Florida Audit Control No. 97-027-3-1 - GTE Florida Incorporated

Dear Ms. Bayo:

On January 25, 2000, GTE Florida Incorporated (GTE) filed a Request for Extension of Time for Filing a Request for Confidential Classification and Motion for Permanent Protective Order in the above matter. GTE hereby withdraws its Request for Extension and files the enclosed original and fifteen copies of a Request for Confidential Classification and Motion for Permanent Protective Order. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas
Enclosures

A part of GTE Corporation

REQUEST
DOCUMENT NUMBER - DATE
01358 FEB - 1 8
FPSC-RECORDS/REPORTING

CONFIDENTIAL
DOCUMENT NUMBER - DATE
01359 FEB - 1 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Joint FCC/State Affiliate Transaction Audit)
Florida Audit Control No. 97-027-3-1 -)
GTE Florida Incorporated)
_____)

Undocketed 000105-TL
Filed: February 1, 2000

ORIGINAL

**GTE FLORIDA INCORPORATED'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PERMANENT PROTECTIVE ORDER**

GTE Florida Incorporated (GTE) asks the Commission to grant confidential classification and a permanent protective order for certain information produced to Staff in connection with its audit of GTE's affiliate relationships. All of this information for which GTE seeks confidential classification falls within Florida Statutes §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 that information." The specific documents for which GTE seeks confidential protection are:

1. GTE Financial Policy and Standard Practice, J-301. This document sets forth the basis for prorating expenses of GTE Service Corporation among GTE affiliates. GTE's internal policies, including this one, are considered confidential by the Company and are not publicly disclosed. Knowledge of GTE's internal finance procedures could give competitors valuable information about ways to structure their own businesses, or about GTE's potential vulnerabilities, without the usual market trial and error.

2. Miscellaneous Billing Requisition General Instructions, Practice 003-106-000. This document contains instructions for GTE personnel to initiate, adjust, or correct miscellaneous billings. Again, it is an internal GTE document that is kept confidential by

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 01359-00. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE

01358 FEB-18

FPSC-RECORDS/REPORTING

the Company and not publicly disclosed. Information about GTE's administrative procedures could provide competitors valuable information about ways to structure their own businesses, or about GTE's potential vulnerabilities, without the usual market trial and error.

3. Billing and Collection Services, Summary of Purchase Order Charges Billed by GTEDS on Behalf of GTE Florida for Invoices Dates 12/01/95. This document contains specific information about invoices issued to various telecommunications companies by GTE Data Services on GTE Florida's behalf. It includes specific company names and invoice amounts, along with purchase order information. This information is considered confidential by both GTE and the companies billed for the services at issue. Public disclosure of amounts paid for various services could interfere with these companies' negotiations for similar service with other entities. In a competitive marketplace, contract prices and payments made to other companies are not typically disclosed publicly.

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. While a ruling on this request is pending, GTE understands that the information at issue is exempt from Florida Statutes, Section 119.01(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). One highlighted, unredacted copy of the confidential material, labeled Exhibit A, is attached to the original of this Request. Redacted copies of these items are attached to this Request as Exhibit B.

Respectfully submitted on February 1, 2000.

By: *Burt J. Habbe*
Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813-483-2617

Attorney for GTE Florida Incorporated



Financial Policy and Standard Practice

PBC

No: J-301
Page: 1 of .
Effective: January 1, 1994
Supersedes: January 1, 1989

REDACTED



Financial Policy and Standard Practice

J-301
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Effective January 1, 1990
Supersedes: January 1, 1989



REDACTED



Financial Policy and Standard Practice

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Supersedes: January 1, 1989



REDACTED



Financial Policy and Standard Practice

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Effective: January 1, 1990
Supersedes: January 1, 1989



REDACTED

EXHIBIT B

GTE Telephone Operations
Administrative Series

Practice 003-106-000
Issue 1, January 1994



**DOCUMENTS EXEMPT FROM 110.07 F.S.
PENDING COMMISSION 25-22.006 RULING**

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BILLING AND COLLECTION SERVICES
SUMMARY OF PURCHASE ORDER CHARGES
BILLED BY GTEDS ON BEHALF OF GTE FLORIDA
FOR INVOICES DATED 12/01/95
(GIX\INVSCH\GTFQ)

REDACTED

*** GTE RESTRICTED ***

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CONFIDENTIAL

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EXHIBIT B

10.04.1997

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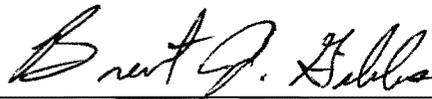
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1/3/96*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Request for Confidential Classification and Motion for Permanent Protective Order were sent via overnight delivery on January 31, 2000 to:

Cathy Bedell, General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Noreen Davis, Director of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Kimberly Caswell