

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of)
Unbundled Network Elements, Phase II)
_____)

Docket No. 990649-TP
Filed: July 5, 2000

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 contained in its response to Staff's Third Set of Interrogatories (No. 15.a.) in this proceeding. While a ruling on this 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.

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 confidential information at issue is GTE's forecasted capital expenditures for the year 2000. 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.

This confidentiality request was filed by or for a "telco" for DN 08134-00. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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DOCUMENT NUMBER-DATE
08135 JUL -58
FPSC-RECORDS/REPORTING

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Respectfully submitted on July 5, 2000.

By: Anthony P. Bellin
for Kimberly Caswell
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Attorney for GTE Florida Incorporated

- b. How does GTE Florida plan to finance these capital expenditures? Please include the amounts of retained earnings, new common equity issues, new short-term debt issues, and new long-term debt issues in your response.

Objection:

- a. GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.
- b. GTEFL objects to this Interrogatory because, to the extent responsive data exists, it is proprietary and highly confidential competitive information. GTEFL further objects to this Interrogatory on the grounds that planning forecast information is irrelevant to selecting a cost model to determine the long run, forward-looking cost of providing unbundled network elements, and is not otherwise relevant to any issue in this proceeding.

Response:

Notwithstanding the above objections, GTEFL responds that _____ of capital expenditures have been planned for GTE Florida for 2000. These expenditures will be financed with internally generated funds. Plans for 2001 and 2002 have not been finalized.

Respondent: Robert G. Deter
Manager – Financial Analysis
1255 Corporate Dr.
Irving, TX 75038

16. a. What are GTE Florida's target capital structure ratios for financial planning purposes? For this response, please include the target common equity ratio, target long-term debt ratio, etc in your response. If the target is expressed as a range rather than a specific percentage, please state that range.
- b. What is GTE Florida's rationale and basis for its target capital structure ratios?

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