

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of) Docket No. 990649-TP
Unbundled Network Elements, Phase II) Filed: July 10, 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 Fourth Set of Interrogatories (No. 41) 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 the original of 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 additions and retirements for digital switching, digital circuit and fiber electronics by account 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 08260-00. 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.

DOCUMENT NUMBER-DATE

00259 JUL 10 08

FPSC-RECORDS/REPORTING

Respectfully submitted on July 10, 2000.

By: Anthony Allen
for Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813/483-2617

Attorney for GTE Florida Incorporated

CONFIDENTIAL

<u>GTE</u> <u>ACCOUNT</u>	<u>YEAR 2000</u> <u>Projected \$</u>	<u>Account Description</u>
Additions		
221210		Digital Electronic Switching
223221		Circuit
223223		Digital Light Wave
242110		Aerial Metallic
242120		Aerial Non Metallic
242210		Underground Metallic
242220		Underground Fiber
242310		Buried Metallic
242320		Buried Non Metallic
243110		Aerial Wire
221219		Digital Switching-Common
222030		Digital Electronic Operator Systems
Retirements		
X21210		Digital Switching
X23221		Digital Circuit
X23223		Digital Light Wave
X42110		Aerial Metallic
X42210		Aerial Non Metallic
X42220		Underground Non Metallic
X42310		Buried Metallic
X43110		Aerial Wire
Respondent: Steve Schroeder Cslt. – Network Planning 600 Hidden Ridge Irving, TX 75038		

42. When does GTEFL plan to no longer add any metallic cable plant?

Objection:

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 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.