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January 14, 1993

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BY HAND-DELIVERY

Mr. Steve C. Tribble, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

Re: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf of MCI Telecommunications Corporation are the original and fifteen copies of MCI's Request for Confidential Classification.

By copy of this letter, this document has been furnished to the parties on the attached service list.

Very truly yours,



Richard D. Melson

RDM/cla
Enclosure

DOCUMENT NUMBER-DATE

00537 JAN 14 83

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the)
Revenue Requirements and Rate)
Stabilization Plan of Southern)
Bell Telephone and Telegraph)
Company)
_____)

Docket No. 920260-TL
Filed: January 14, 1993

MCI'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

MCI Telecommunications Corporation (MCI), pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Confidential Classification for its response to Interrogatory Nos. 2 and 4 of Staff's First Set of Interrogatories.

1. MCI is filing its Request for Confidential Classification for its response to Interrogatory Nos. 2 and 4 because the response contains proprietary, confidential business information of MCI related to its competitive interLATA and intraLATA toll services.

2. One copy of the answers for which confidential classification is requested is included in a sealed envelope attached hereto as Attachment A and labeled "CONFIDENTIAL." On this copy, the specific information for which confidentiality is requested has been highlighted. Copies of Attachment A are not being served on the other parties to this proceeding.

3. Two copies of the answers with the confidential information redacted are included in an envelope attached hereto as Attachment B. Copies of the redacted answers have been served on the parties of record as part of MCI's Responses to Staff's First Set of Interrogatories.

4. The highlighted information for which confidential classification is requested reflects MCI's MTS-like traffic volumes (MOU) and revenues, broken down by mileage band and by business/residential usage, for both its interLATA and intraLATA services.

5. Both the interLATA and intraLATA toll markets are competitive arenas. The highlighted information discloses usage patterns and overall traffic volumes for different classes of MCI's customers for one of MCI's major toll services. Competitors of MCI could use this information -- in combination with publicly available information on MCI's prices and product offerings -- to analyze MCI's customer base, to analyze the effectiveness of MCI's marketing strategies, and to selectively target their own marketing efforts to respond to MCI's revealed strengths and/or weaknesses in the marketplace. The disclosure of this competitive toll market information would impair MCI's ability to compete effectively in the interLATA and intraLATA toll markets in Florida.

6. Section 364.183(3)(a),(e), Florida Statutes, expressly includes as proprietary confidential business information (i) trade secrets, and (ii) any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. The information contained in MCI's response to Interrogatory Nos. 2 and 4 meets both of these statutory criteria, as more fully described above, and is therefore entitled to confidential classification,

7. MCI has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been publicly disclosed.

WHEREFORE, for the reasons stated above, MCI moves the Prehearing Officer to enter an order:

(a) declaring that the information provided by MCI in response to Interrogatory Nos. 2 and 4 of Staff's First Set of Interrogatories constitutes confidential proprietary business information of MCI, and is not subject to public disclosure; and

(b) directing that the information be returned to MCI at the conclusion of these proceedings.

RESPECTFULLY SUBMITTED this 14 th day of January, 1993.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by U.S. Mail this 14th day of January, 1993.

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