

B. CUSTOMER SPECIFIC INFORMATION

The second rationale for confidentiality is for information relating to customers' names, addresses, telephone numbers, and other service details of a customer specific nature. The company states that such information is entitled to confidential classification pursuant to Section 119.07(3)(w), Florida Statutes (customer name, address, and telephone number) and prior Commission orders protecting customer specific information from public disclosure (Order No. 93-1044-CFO-TL, issued July 19, 1993). The only other customer specific information sought to be protected relates to Southern Bell's business records containing the category and types of services subscribed to by the named customers. The company states that this information is considered customer proprietary network information (CPNI) by both the FPSC and the FCC and that the Commission has consistently held that customer-specific information should be kept confidential and thus not subject to the public inspection and examination provisions of Section 119.07(1), Florida Statutes.

Commission Order No. 93-1044-CFO-TL, cited by Southern Bell, does not grant confidential classification to subscriber telephone numbers. In the instance related to that order, the company asked for confidential classification for the names and addresses of the subscribers and that was granted by the order. Commission policy in the past has been that of the three items: names, addresses, and phone numbers, only two need be kept confidential to maintain the confidentiality of the customer. As the cited order suggests, these two are usually the name and address.

The company is correct in its reference to FCC guidelines that maintain the confidentiality of CPNI. Therefore, I agree that the statute addresses such information as customers' names, addresses, telephone numbers, and other service details of a customer specific nature. Based on the above discussion, I recommend that the names and addresses and CPNI should be granted confidential status and that confidential classification be denied regarding the telephone numbers.

C. COMMERCIALY VALUABLE INFORMATION

The third rationale for confidentiality is for one document titled "Work Activity Statistical Sampling Process (WASSP) Time Reporting Procedures for Technicians." The company states that this document is entitled to confidential classification pursuant to Section 364.183(3) and (3)(e), Florida Statutes. This document consists of details relating to the WASSP sample selection process, field technician responsibilities and procedures, procedures for preparing work logs required by the WASSP, source documentation requirements, and other valuable information describing the process in detail. While the document has not been sold to anyone, BST has had discussions with independent telephone companies expressing interest in purchasing the package. The company states that the

commercial value of the document will remain intact only so long as it is not publicly disclosed. Based on the utility's representations, I agree that the statute addresses such information and that this document should be granted confidential status.

Southern Bell also requested a waiver of the line-by-line identification requirements of Rule 25-22.006, Florida Administrative Code since the entire document has commercial value and it represents the blueprint for the procedural aspects of the WASSP process. I agree that in the case of this document the rule should be waived. This document lists the procedures and there is no extraneous material that is not part of the communication of the process. Therefore, I recommend that the rule should be waived in this instance.

Workpaper No.	Company Page #	Lines	Rationale	Recommendation
47-3 p.2	178	3,18	A	Grant
47-3 p.3	179	2,16	A	"
47-3 p.4	180	2,21	A	"
47-3 p.5	181	2,13	A	"
47-3 p.6	182	2	A	"
47-3 p.7	183	2,17	A	"
47-3 p.8	184	2,11	A	"
47-3 p.9	185	2,19	A	"
47-3 p.10	186	2,16	A	"
47-3 p.11	187	2,18	A	"
47-3 p.12	188	2,4	A	"
47-3 p.13	189	2,24	A	"
47-3 p.14	190	2	A	"
47-3 p.15	191	3,22	A	"
47-3 p.16	192	2,19	A	"
47-3 p.17	193	2,21	A	"
47-3 p.19	195	2-6	A	"
48-2/1	217-234	All	C	Grant
48-3/1	241	2,21	A	"

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Workpaper No.	Company Page #	Lines	Rationale	Recommendation
48-3/1-1 p.1	243	6	A	"
48-3/1-2 p.1	247	7 Columns A-E	A B	Grant Deny, this is only a phone number with no other identifying information.
48-3/1-2/1	251	2,3,6	B	Grant as to customer name and address; Deny as to phone number
48-3/1-2/2 p.1	252	5-7	B	Deny as to phone number; Grant as to remaining information.
48-3/1-2/2 p.2	253	3-6,8,9, 11-15,17,18	B	"
48-3/1-2/2 p.3	254	3,4,7-9,11, 13-16	B	"
48-3/1-3 p.1	256	7, Columns A-E	A B	Grant Deny, this is only a phone number with no other identifying information.
48-3/1-3/1	260	2,3,6	B	Grant as to customer name and address; Deny as to phone number
48-3/1-3/2	261	7-10,15,17	B	Deny as to phone number; Grant as to remaining information.
48-3/2	264	2,19	A	Grant
48-3/2-1	266	7	A	"
48-3/2-2 p.1	270	7 Columns A-H	A B	Grant Deny, this is only a phone number with no other identifying information.
48-3/2-2 p.4	273	2-3	B	Grant as to customer name and address; Deny as to phone number
48-3/2-2/1 p.1	276	4,6-9,17, 20-23,27-31	B	Deny as to phone number; Grant as to remaining information.
48-3/2-2/1 p.2	277	3-5,13-16, 26,28-30	B	"
48-3/2-2/1 p.3	278	7,9-14,19, 23-25,37-41	B	"

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Workpaper No.	Company Page #	Lines	Rationale	Recommendation
48-3/2-2/1 p.4	279	5,7-9	B	"
48-3/6 p.2	293	3,19	A	Grant
48-3/6 p.3	294	2,16	A	"
48-3/6 p.4	295	2,21	A	"
48-3/6 p.5	296	2,13	A	"
48-3/6 p.6	297	2	A	"
48-3/6 p.7	298	2,17	A	"
48-3/6 p.8	299	2,11	A	"
48-3/6 p.9	300	2,19	A	"
48-3/6 p.10	301	2,16	A	"
48-3/6 p.11	302	2,18	A	"
48-3/6 p.12	303	2,4	A	"
48-3/6 p.13	304	2,24	A	"
48-3/6 p.14	305	2	A	"
48-3/6 p.15	306	3,22	A	"
48-3/6 p.16	307	2,19	A	"
48-3/6 p.17	308	2,20	A	"
48-3/6 p.19	310	2-6	A	"

✓ cc: Division of Records and Reporting (K. Smith)
 Division of Auditing and Financial Analysis (Welch, Wilson, Pelt)