

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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In Re: Expanded Interconnection Phase II)
and Local Transport Restructure)

Docket No. 921074-TP
Docket No. 930955-TL
Docket No. 940014-TL
Docket No. 940020-TL
Docket No. 931196-TL
Docket No. 940190-TL

Filed: April 21, 1994

GTE FLORIDA INCORPORATED'S
MOTION FOR TEMPORARY PROTECTIVE ORDER

Under Commission Rule 25-22.006(5)(c), GTE Florida Incorporated (GTEFL) requests a temporary protective order exempting from Florida Statutes section 119.07(1) certain material produced in response to the Office of Public Counsel's First Request for Production of Documents. GTEFL asks for interim protection of this information until the Office of Public Counsel (Public Counsel) tells the Company what, if any, confidential information will be used in this proceeding. At that time, GTEFL will file a detailed motion for permanent confidential classification of the confidential data.

Highlighted, unredacted copies of the confidential material have been sent only to Public Counsel. All other parties have received redacted copies of the confidential information.

All of the information for which GTEFL seeks confidential protection falls within Florida Statutes section 364.183(3)(e), which defines the terms "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 confidential information in this filing includes the Company's forecasts about

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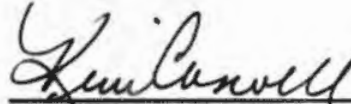
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the impact of switched and special access interconnection on GTEFL's revenues and expenses, as well as information about which entities have requested collocation in which central offices. In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the ratepayer.

For these reasons, GTEFL asks the Commission to issue a temporary protective order covering the confidential information contained in documents produced by GTEFL in response to questions 1, 3, and 9 of Public Counsel's data request.

Respectfully submitted on April 21, 1994.

By:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Notice of Service, Responses to Citizens' First Request for Production of Documents and Motion for Temporary Protective Order in Docket No. 921074-TP were sent by U. S. mail on April 21, 1994, to the parties on the attached list.



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