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May 16, 1994

ORIGINAL
FILE COPY

IN REPLY REFER TO
Tallahassee

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: In re: Expanded Interconnection Phase II and
Local Transport Restructure; Docket Nos. ~~921074-TP,~~
930955-TL, 940014-TL, 940020-TL and 931196-TL

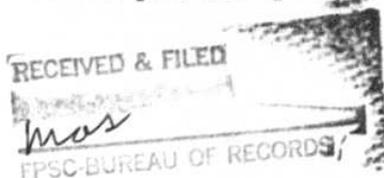
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of United Telephone Company of Florida's Request for Confidential Classification. Attachment "A" to this document represents an edited version of the documents to which this Request relates. The unedited version of Attachment "A" was submitted to the Division of Records and Reporting under confidential cover on June 7, 1994.

Because of the number of pages of documents (over 300 pages), the Company is only submitting the original and two copies of the edited version of Attachment "A" and copies are not being served on the parties. However, if any party wishes to review the edited version, arrangements may be made with this office to do so.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.



Sincerely,

John P. Fons
JOHN P. FON

X-22y DN
05622-92

JPF/csu
Enclosures

cc: All Parties of Record (w/o Attachment "A")
utd\bayo.rcc

DOCUMENT NUMBER-DATE

06405 JUN 28 1994

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) Docket No. 921074-TP,
Phase II and Local Transport) 930955-TL, 940014-TL,
Restructure) 940020-TL, and 931196-TL
_____) Filed: June 28, 1994

UNITED TELEPHONE COMPANY OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

United Telephone Company of Florida ("Sprint/United-Florida" or the "Company"), by and through its undersigned counsel, and in accordance with Section 25-22.006, Florida Administrative Code, files this Request for Confidential Classification within twenty-one days of filing its Notice of Intent to Request Confidential Classification, and says:

1. Sprint/United-Florida requests that the documents previously submitted to the Division of Records and Reporting on June 7, 1994, with the information asserted to be confidential highlighted in yellow, be classified as "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes (1991). Attachment "A" is an edited version of the documents on which the information asserted to be confidential has been blocked out.

2. Documents Nos. 1 through 4 of Attachment "A" were provided to the Division of Records and Reporting, together with a Notice of Intent to Request Confidential Classification, on June 7, 1994, as a Response to Staff's Third Request for Production of Documents, Nos. 4, 8, 10, 11 and 12.

DOCUMENT NUMBER-DATE

06405 JUN 28 8

FPSC-RECORDS/REPORTING

3. Document No. 1 of Attachment "A" reflects United's anticipated effect of switched interconnection on the Company's revenues and expenses. Document No. 2 of Attachment "A" reflects United's anticipated effect of switched interconnection on the Company's market share for many services offered by the Company. Document No. 3 of Attachment "A" reflects United's cost studies that analyze the cost to the Company to provide special access DS-1 and DS-3 facilities used for intrastate private line and special access services. Document No. 4 of Attachment "A" reflects United's cost studies that estimate the cost of tandem switching. The highlighted, unredacted portions of these documents should be considered confidential because disclosure of that information would harm the Company's ratepayers and/or the business operations of the Company and its IXC customers.

4. The line-by-line and page-by-page justification required by Section 25-22.006(4), Florida Administrative code, including statements concerning how the ratepayers and/or the business operations of the Company and its IXC customers will be harmed if this information is disclosed to the public, is attached hereto and incorporated herein by reference as Attachment "B."

5. The information in Attachment "A" is intended to be and is treated by Sprint/United-Florida as private, confidential information and has not been disclosed to the public.

WHEREFORE, Sprint/United-Florida respectfully requests that the Commission issue an order declaring that the highlighted and redacted information in the documents in Attachment "A" is

proprietary confidential business information and exempt from disclosure under the public records laws of the State of Florida.

DATED this 28th day of June, 1994.



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& McMullen
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(904) 224-9115

ATTORNEYS FOR UNITED TELEPHONE
COMPANY OF FLORIDA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 28th day of June, 1994, to the following:

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Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) Docket No. 921074-TP,
Phase II and Local Transport) 930955-TL, 940014-TL,
Restructure) 940020-TL, and 931196-TL

UNITED TELEPHONE COMPANY OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL DOCUMENTS

Line-by-Line/Page-by-Page
Justification

ATTACHMENT "B"

The following data on the document identified as Attachment "A" is confidential.

Document No.	Page	Data Point	Line(s)	Columns	Justification
1	2	--	2-18, 20-26	A,B,C	Note 1
	3	--	2-4, 6-7, 9-14, 16, 18, 20-25	A,B,C	Note 2
	4	--	3-4, 6-11, 14-15, 17-22, 25-26, 28-34, 37-38, 40-46, 49-50, 52-59	A,B,C	Note 1
	5	--	2-11, 13-22, 24-26, 28-34, 38-39, 40-46, 49-50, 52-59	A,B,C	Note 2
	6	--	All lines	None	Note 3
	7	--	All lines	None	Note 3
	8	--	All lines	None	Note 3
	9	--	All lines	None	Note 3
	10	--	All lines	None	Note 3
	11	--	All lines	None	Note 3
	12	--	All lines	None	Note 3
	13	--	All lines	None	Note 3
	14	--	All lines	None	Note 3
	15	--	All lines	None	Note 3
	16	--	2-20, 22-28	A	Note 1
	17	--	2-11, 13-21, 23-25, 27-33	A,B	Note 1
	18	--	2-29, 31-35	A,B	Note 2
	19	--	2-42	A,B	Note 2
	20	--	All lines	None	Note 3

Document No.	Page	Data Point	Line(s)	Columns	Justification
1 (cont.)	21	--	All lines	None	Note 3
	22	--	2-20, 22-28	A,B,C	Note 1
	23	--	2-11, 13-21, 23-25, 27-33	A,B,C,D	Note 1
	24	--	2-29, 31-35	A,B,C,D	Note 2
	25	--	2-4, 6-31, 33-41	A,B,C,D	Note 2
2	1	--	All lines	None	Note 4
3	34	--	14	None	Note 5
	35	--	5, 11	A-E	Note 6
	43	--	3-8	A-F	Note 6
	44	--	4-12	D, F-I	Note 6
	45	--	4-16	C-K	Note 6
	46	--	8-9	C,E,G,H	Note 6
	47	--	8-9, 18	C-K	Note 6
	48	--	3, 5	C-I	Note 6
	49	--	3, 5-6	C-K	Note 6
	50	--	3	D,F,G,I	Note 6
	51	--	3-4	C-K	Note 6
	55	--	10-12	C,E,G,H	Note 6
	56	--	10-12, 18	C,E,F,H	Note 6
	57	--	3-8	C,E,G,H	Note 6
	58	--	3-15	C-K	Note 6
	62	--	3-6	A-I	Note 6
	63	--	2-7, 10-14	A,B	Note 6

Document No.	Page	Data Point	Line(s)	Columns	Justification
3 (cont.)	64	--	1-14	A	Note 6
	65	--	1-4	A-D	Note 6
	66	--	4-10, 17-22, 30-31	A	Note 6
	67	--	4-10, 16-21, 28-29	A	Note 6
	68	--	4-10, 16-21, 29-30	A	Note 6
	69	--	4-10, 17-22, 32-33	A	Note 6
	87	--	2-27	A-D	Note 6
	88	--	2-27	A-D	Note 6
	91	--	3-9, 12	A-C	Note 6
	127	--	10	None	Note 7
	132	--	1-2, 4, 10, 12-13	C-G	Note 8
	133	--	1-20	D-J	Note 8
	134	--	1-22	C-J	Note 8
	135	--	1-22	C-J	Note 8
	136	--	1-2, 4, 11, 13-14	C-G	Note 8
	137	--	1-19	D-J	Note 8
	138	--	1-22	C-J	Note 8
	139	--	1-22	C-J	Note 8
	140	--	1-2, 4, 11, 13-14	C-G	Note 8
	141	--	1-20	D-J	Note 8
	142	--	1-22	C-J	Note 8

Document No.	Page	Data Point	Line(s)	Columns	Justification
3 (cont.)	143	--	1-2, 4, 11, 13-14	C-J	Note 8
	144	--	1-2, 4, 11, 13-14	C-G	Note 8
	145	--	1-19	D-J	Note 8
	146	--	1-22	C-J	Note 8
	147	--	1-22	C-J	Note 8
	148	--	1-2, 4, 11, 13-14	C-G	Note 8
	149	--	1-20	D-J	Note 8
	150	--	1-22	C-J	Note 8
	151	--	1-22	C-J	Note 8
	152	--	1-2, 4, 11, 13-14	C-G	Note 8
	153	--	1-20	D-J	Note 8
	154	--	1-22	C-J	Note 8
	155	--	1-22	C-J	Note 8
	156	--	1-2, 4, 11, 13-14	C-G	Note 8
	157	--	1-19	D-J	Note 8
	159	--	1-22	C-J	Note 8
	160	--	1-2, 4, 11, 13-14	C-G	Note 8
	161	--	1-20	D-J	Note 8
	162	--	1-22	C-J	Note 8
	163	--	1-22	C-J	Note 8
	164	--	1-2, 4, 11, 13-14	C-G	Note 8

Document No.	Page	Data Point	Line(s)	Columns	Justification
3 (cont.)	165	--	1-20	D-J	Note 8
	166	--	1-22	C-J	Note 8
	167	--	1-22	C-J	Note 8
	168	--	1-2, 4, 11, 13-14	C-G	Note 8
	169	--	1-20	D-J	Note 8
	170	--	1-22	C-J	Note 8
	171	--	1/22	C-J	Note 8
	172	--	1-2, 4, 11, 13-14	C-G	Note 8
	173	--	1-20	D-J	Note 8
	174	--	1-22	C-J	Note 8
	175	--	1-22	C-J	Note 8
	176	--	1-2, 4, 11, 13-14	C-G	Note 8
	177	--	1-20	D-J	Note 8
	178	--	1-22	C-J	Note 8
	179	--	1-22	C-J	Note 8
	180	--	1-2, 4, 11, 13-14	C-G	Note 8
	181	--	1-20	D-J	Note 8
	182	--	1-22	C-J	Note 8
	183	--	1-22	C-J	Note 8
	184	--	1-2, 4, 11, 13-14	C-G	Note 8
	185	--	1-19	C-J	Note 8
	186	--	1-22	C-J	Note 8

Document No.	Page	Data Point	Line(s)	Columns	Justification
3 (cont.)	187	--	1-22	C-J	Note 8
	188	--	1-2, 4, 11, 13-14	C-C	Note 8
	189	--	1-20	D-J	Note 8
	190	--	1-22	C-J	Note 8
	191	--	1-22	C-J	Note 8
	192	--	1-2, 4, 11, 13-14	C-G	Note 8
	193	--	1-19	D-J	Note 8
	194	--	1-22	C-J	Note 8
	195	--	1-22	C-J	Note 8
	196	--	1-2, 4, 11, 13-14	C-G	Note 8
	197	--	1-20	D-J	Note 8
	198	--	1-22	C-J	Note 8
	199	--	1-22	C-J	Note 8
	200	--	1-2, 4, 11, 13-14	C-G	Note 8
	201	--	1-20	D-J	Note 8
	202	--	1-22	C-J	Note 8
	203	--	1-22	C-J	Note 8
	204	--	1-2, 4, 11, 13-14	C-G	Note 8
	205	--	1-20	D-J	Note 8
	206	--	1-22	C-J	Note 8
	207	--	1-22	C-J	Note 8
	208	--	1-2, 4, 11, 13-14	C-G	Note 8

Document No.	Page	Data Point	Line(s)	Columns	Justification
3 (cont.)	209	--	1-19	D-J	Note 8
	210	--	1-22	C-J	Note 8
	211	--	1-22	C-J	Note 8
	212	--	1-21	B-H	Note 8
	213	--	1-22 23	B-D None	Note 8
	215	--	0-14, 17-46	B,C-F	Note 8
	216	--	1-22 23	C,F None	Note 8
	217	--	1-15, 18-25, 34-37, 42, 45	B,C,E,F	Note 8
	218	--	1-22 23	B-D None	Note 8
	219	--	1-21 22	C,F None	Note 8
	228	--	3-4, 6-8	A-F	Note 8
	229	--	2-10	D,F-I	Note 8
	230	--	2-15	C-K	Note 8
	231	--	1-3	C,E,G,H	Note 8
	232	--	1-3, 15	C-J	Note 8
	233	--	2, 4	C-I	Note 8
	234	--	2, 4-5	C-K	Note 8
	235	--	2	D,F,G,I	Note 8
	236	--	2-3	C-K	Note 8
	240	--	1, 7-8	C-H	Note 8
	241	--	1-16	C-K	Note 8
	242	--	1, 7-8	C-I	Note 8

Document No.	Page	Data Point	Line(s)	Columns	Justification	
3 (cont.)	243	--	1-16	C-K	Note 8	
	244	--	4-6	C,E,G,H	Note 8	
	245	--	1-17	C-K	Note 8	
	249	--	1-6	A-I	Note 8	
	250	--	2-7, 10-14	A-B	Note 8	
	251	--	1-14	A	Note 8	
	252	--	1-6	A-D	Note 8	
	253	--	4-10, 17-22, 30-31	A	Note 8	
	254	--	4-10, 22-23	A	Note 8	
	255	--	2-5, 19-20	A	Note 8	
	256	--	4-10, 16-21, 28-29	A	Note 8	
	257	--	4-10, 16-22, 31-32	A	Note 8	
	258	--	4-10, 16-21, 29-30	A	Note 8	
	259	--	4-10, 19-24, 32-33	A	Note 8	
	277	--	2-33	A-E	Note 8	
	278	--	2-32	A-E	Note 8	
	281	--	2-3, 6-7, 10, 12-13, 15	A-C	Note 8	
	4	1	--	2-12	A	Note 9
		2	--	2-16	C-D	Note 10
3		--	4-5, 8-9	A-C	Note 10	
4		--	2-15	A-B	Note 10	
5		--	4-10, 15-16	A-J	Note 10	

Document No.	Page	Data Point	Line(s)	Columns	Justification
4 (cont.)	6	--	1-43	A-F	Note 10
	7	--	1-41	B-G	Note 10
	8	--	1-43	B-G	Note 10
	9	--	1-43	B-G	Note 10
	10	--	1-41	B-G	Note 10
	11	--	1-41	B-G	Note 10
	12	--	1-41	B-G	Note 10
	13	--	1-41	B-G	Note 10
	14	--	1-41	B-G	Note 10
	15	--	1-43	B-G	Note 10
	16	--	1-41	B-G	Note 10
	17	--	1-41	B-G	Note 10
	18	--	1-43	B-G	Note 10
	19	--	1-37	B-G	Note 10
	20	--	1-41	B-G	Note 10
	21	--	1-43	B-G	Note 10
	22	--	1-39	B-G	Note 10
	23	--	1-43	B-G	Note 10
	24	--	1-39	B-G	Note 10
	25	--	1-40	B-G	Note 10
	26	--	1-43	B-G	Note 10
	27	--	1-41	B-G	Note 10
	28	--	1-43	B-G	Note 10
	29	--	1-41	B-G	Note 10
	30	--	1-41	B-G	Note 10

Document No.	Page	Data Point	Line(s)	Columns	Justification
4 (cont.)	31	--	1-43	B-G	Note 10
	32	--	1-41	B-G	Note 10
	33	--	1-43	B-G	Note 10
	34	--	1-41	B-G	Note 10
	35	--	1-41	B-G	Note 10
	36	--	1-41	B-G	Note 10
	37	--	1-43	B-G	Note 10
	38	--	1-41	B-G	Note 10
	39	--	1-43	B-G	Note 10
	40	--	1-41	B-G	Note 10
	41	--	1-43	B-G	Note 10
	42	--	1-35	B-G	Note 10
	43	--	1-41	B-G	Note 10
	44	--	1-43	B-G	Note 10
	45	--	1-41	B-G	Note 10
	46	--	1-43	B-G	Note 10
	47	--	1-39	B-G	Note 10
	48	--	1-43	B-G	Note 10
	49	--	1-39	B-G	Note 10
	50	--	1-43	B-G	Note 10
	51	--	1-43	B-G	Note 10
	52	--	1-39	B-G	Note 10
	53	--	1-43	B-G	Note 10
	54	--	1-41	B-G	Note 10
	55	--	1-43	B-G	Note 10

Document No.	Page	Data Point	Line(s)	Columns	Justification
4 (cont.)	56	--	1-41	B-G	Note 10
	57	--	1-43	B-G	Note 10
	58	--	1-41	B-G	Note 10
	59	--	1-43	B-G	Note 10
	60	--	1-41	B-G	Note 10
	61	--	1-41	B-G	Note 10
	62	--	1-41	B-G	Note 10
	63	--	1-43	B-G	Note 10
	64	--	1-39	B-G	Note 10
	65	--	1-41	B-G	Note 10
	66	--	1-43	B-G	Note 10
	67	--	1-43	B-G	Note 10
	68	--	1-39	B-G	Note 10
	69	--	1-43	B-G	Note 10
	70	--	1-41	B-G	Note 10
	71	--	1-40	B-G	Note 10
	72	--	1-41	B-G	Note 10
	73	--	1-43	B-G	Note 10
	74	--	1-38	B-G	Note 10
	75	--	4-9	None	Note 10

Note 1: This information gives an overview of the Companies' access and toll markets (both interstate and intrastate) and forecasts the competitive impact on these revenues. This information describes the size of the markets and the revenues available to a competitor. Because this information is not available elsewhere, it would be

valuable to the Companies' competitors as they develop their marketing and pricing plans. As such, this information is valuable to the Companies and their customers and the public disclosure of this proprietary confidential business information potentially would harm the Companies' operations and customers.

Note 2: This information consists of access and toll demand and revenue data. This data provides a detailed picture of the size of the access and toll markets and the demand and revenue which is available to the Companies' competitors. Because this information is not available elsewhere, it would be valuable to the Companies' competitors as they develop their marketing and pricing plans. As such, this information is valuable to the Companies and their customers and the public disclosure of this proprietary confidential business information potentially would harm the Companies' operations and customers.

Note 3: This information consists of basic methodology and assumptions used to develop the impact on the Companies' access and toll revenues from the introduction of expanded interconnection and access and toll competition. This information was developed by the Companies and it is not available elsewhere. Because this information is not available elsewhere, it would be extremely valuable to the Companies' competitors as they develop their own marketing and pricing strategies. As such, public disclosure of this proprietary confidential business information potentially would harm the Companies' operations and customers.

Note 4: This information consists of competitive strategies and growth potential for the Companies' switched and special access, intraLATA toll and local exchange service markets. This information, which was developed by the Companies and is not available elsewhere, is valuable to the Companies' operations and customers and would be equally valuable to the Company's competitors as they decide what markets to enter and as they develop their marketing and pricing strategies. As such, public disclosure of this proprietary confidential business information potentially would harm the Companies' operations and customers.

Note 5: This information consists of the fiber cable utilization factor which is essential to the development of the Company's Light Link Cost Study. This factor is not readily available elsewhere and depends upon a variety of Company conducted empirical analyses and is valuable to the Company's operations and customers. Because it is

not readily available elsewhere, it would also be valuable to the Company's competitors as they develop their pricing strategies. As such, public disclosure of this proprietary confidential business information would harm the Company's operations and customers.

Note 6: This information consists of a variety of cost factors and investment data that are essential to the development of the Company's Light Link Cost Study. This data is not readily available elsewhere and depends upon a variety of Company conducted empirical analyses and is valuable to the Company's operations and customers. Because it is not readily available elsewhere, it would also be valuable to the Company's competitors as they develop their pricing strategies. As such, public disclosure of this proprietary confidential business information would harm the Company's operations and customers.

Note 7: This information consists of the fiber cable utilization factor which is essential to the development of the Company's TransLink Cost Study. This factor is not readily available elsewhere and depends upon a variety of Company conducted empirical analyses and is valuable to the Company's operations and customers. Because it is not readily available elsewhere, it would also be valuable to the Company's competitors as they develop their pricing strategies. As such, public disclosure of this proprietary confidential business information would harm the Company's operations and customers.

Note 8: This information consists of a variety of cost factors and investment data that are essential to the development of the Company's TransLink Cost Study. This data is not readily available elsewhere and depends upon a variety of Company conducted empirical analyses and is valuable to the Company's operations and customers. Because it is not readily available elsewhere, it would also be valuable to the Company's competitors as they develop their pricing strategies. As such, public disclosure of this proprietary confidential business information would harm the Company's operations and customers.

Note 9: This information consists of incremental cost data relating to tandem switching. This cost data, which was developed by the Companies and is not available elsewhere, supplies some of the elements for pricing the Company's operations and customers. It would also be valuable to the Company's access competitors as they develop their marketing and pricing strategies. As such, public disclosure of this proprietary confidential business information potentially would harm the Company's operations and customers.

Note 10: This information consists of switched access demand and revenue data, most of which is in an interchange carrier-by-interchange carrier, route-by-route specific basis. This information, which was developed by the Company and is not available elsewhere, is valuable to the Company's operations and customers because it details the size of the switched access market. It is also valuable to the Company's IXC customers because it shows IXC data on a route-by-route basis. Because this information is not available elsewhere, it would also be valuable to the Company's access and their IXC customer's competitors as these competitors decide which markets to enter and as they develop their marketing and pricing strategies. As such, public disclosure of this proprietary confidential business information potentially would harm the Company's operations and customers.

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