

Marceil Morrell\*\* Vice President & General Counsel - Florida

Associate General Counsel Anthony P. Gillman\*\* Leslie Reicin Stein\*

Attorneys\* Kimberly Caswell M. Eric Edgington Ernesto Mayor, Jr.

Licensed in Florida
Certified in Florida as Authorized House Counsel

GTE Telephone Operations

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One Tampa City Center 201 North Franklin Street, FLTC0007 Post Office Box 110 Tampa, Florida 33601 813-483-2606 813-204-8870 (Facsimile)

December 16, 1996

Ms. Blanca S. Bayo, Director Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re. Docket No. 961173-TP Petition of Sprint Communications Company Limited Partnership for Arbitration of Proposed Interconnection Agreement with GTE Florida Incorporated Pursuant to the Telecommunications Act of 1996

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Protective Order regarding
ACK certain information submitted in response to Sprint's First Set of Interrogatories and Data Requests, No. 1C, for filing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter.
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CMU Very truly yours,

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- LEG --- Anthony P. Gillman
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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition of Sprint Communications Company Limited Partnership for Arbitration of Proposed Interconnection Agreement with GTE Florida Incorporated Pursuant to the Telecommunications Act of 1996 Docket No. 961173-TP Filed: December 16, 1996

## GTE FLORIDA INCORPORATED'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

GTE Florida Incorporated (GTEFL) seeks confidential classification and a permanent protective order for certain information submitted in response to Sprint Communications Company Limited Partnership's First Set of Interrogatories and Data Requests, No. 1C, in this proceeding.

All of this information falls within Florida Statutes §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 that information." The materials in question are directory assistance and extended area service agreements between GTEFL and United Telephone Company. Because these agreements are not required to be filed with the Commission, their terms and conditions are not subject to public disclosure. In a competitive business, knowledge obtained about a competitor and the agreements it enters can be used to the detriment of all parties to such agreements.

Furthermore, because the information would be disclosed to competitors through a regulatory proceeding--rather than through legitimate market trial and error DOCUMENT NUMER DATE 13412 DEC 178

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processes--the marketplace will be skewed, to the ultimate detriment of the consumer. This effect is particularly troublesome in the context of this docket, which is intended to set rules for encouraging rational and efficient competition, rather than providing any entity a competitive advantage.

While a ruling on this request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes, Section 119.01(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). One copy of the confidential material, labeled Exhibit A, is attached to the original of this Request. Because GTEFL is designating the entire agreement as confidential, redacted copies are not attached.

Respectfully submitted on December 16, 1996.

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Anthony Gillman Kimberly Caswell Post Office Box 110, FLTC0007 Tampa, Florida 33601 Telephone: 813-483-2615

Attorneys for GTE Florida Incorporated

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Request for Confidential Classification and Motion for Protective Order in Docket No. 961173-TP were sent via U.S. mail on December 16, 1996 to the parties listed below.

> Monica Barone/Charlie Pellegrini Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> > Benjamin W. Fincher Sprint 3100 Cumberland Circle Atlanta, GA 30339

C. Everett Boyd Ervin, Varn, Jacobs, Odom & Irvin 305 S. Gadsden Street Tallahassee, FL 32302

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