

Kimberly Caswell Counsel

#### GTE SERVICE CORPORATION

One Tampa City Center 201 North Franklin Street (33602) Post Office Box 110, FLTC0007 Tampa, Florida 33601-0110 813-483-2606 813-204-8870 (Facsimile)

February 1, 2000

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

ORIGINAL

000105-TL

Re: Undocketed

> Joint FCC/State Affiliate Transaction Audit Florida Audit Control No. 97-027-3-1 - GTE Florida Incorporated

Dear Ms. Bayo:

On January 25, 2000, GTE Florida Incorporated (GTE) filed a Request for Extension of Time for Filing a Request for Confidential Classification and Motion for Permanent Protective Order in the above matter. GTE hereby withdraws its Request for Extension and files the enclosed original and fifteen copies of a Request for Confidential Classification and Motion for Permanent Protective Order. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas **Enclosures** 

A part of GTE Corporation DOCUMENT NUMBER - DATE

01358 FEB-18

01359 FEB-18

FPSC-RECORDS/REPORTING

FPSC-RECORDS/REPORTING

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Joint FCC/State Affiliate Transaction Audit Florida Audit Control No. 97-027-3-1 -	)	Undocketed 000105-TL Filed: February 1, 2000
GTE Florida Incorporated	)	ORIO
GTE FLORIDA INCORPORATED'S  BEQUEST FOR CONFIDENTIAL CLASSIFICATION AND		

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

GTE Florida Incorporated (GTE) asks the Commission to grant confidential classification and a permanent protective order for certain information produced to Staff in connection with its audit of GTE's affiliate relationships. All of this information for which GTE seeks confidential classification 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 specific documents for which GTE seeks confidential protection are:

- 1. GTE Financial Policy and Standard Practice, J-301. This document sets forth the basis for prorating expenses of GTE Service Corporation among GTE affiliates. GTE's internal policies, including this one, are considered confidential by the Company and are not publicly disclosed. Knowledge of GTE's internal finance procedures could give competitors valuable information about ways to structure their own businesses, or about GTE's potential vulnerabilities, without the usual market trial and error.
- 2. Miscellaneous Billing Requisition General Instructions, Practice 003-106-000. This document contains instructions for GTE personnel to initiate, adjust, or correct miscellaneous billings. Again, it is an internal GTE document that is kept confidential by

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 0/359-00. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE 0 | 358 FEB-18 FPSC-RECORDS/REPORTING the Company and not publicly disclosed. Information about GTE's administrative procedures could provide competitors valuable information about ways to structure their own businesses, or about GTE's potential vulnerabilities, without the usual market trial and error.

3. Billing and Collection Services, Summary of Purchase Order Charges Billed by GTEDS on Behalf of GTE Florida for Invoices Dates 12/01/95. This document contains specific information about invoices issued to various telecommunications companies by GTE Data Services on GTE Florida's behalf. It includes specific company names and invoice amounts, along with purchase order information. This information is considered confidential by both GTE and the companies billed for the services at issues. Public disclosure of amounts paid for various services could interfere with these companies' negotiations for similar service with other entities. In a competitive marketplace, contract prices and payments made to other companies are not typically disclosed publicly.

In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer. While a ruling on this request is pending, GTE 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 highlighted, unredacted copy of the confidential material, labeled Exhibit A, is attached to the original of this Request. Redacted copies of these items are attached to this Request as Exhibit B.

Respectfully submitted on February 1, 2000.

Ву:

Kimberly Caswell

Post Office Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for GTE Florida Incorporated



EXHIBIT B

Docket No. 94-02
 Page 1 of 4

Financial Policy and Standard Practice

(PBC)

No:

J-301

Page:

l of January 1, 199(

Supersedes: January 1, 1989



Docket No. 94-( Page 2 of 4

#### Financial Policy and Standard Practice

J-301

age 2 of 4 Effective January 1, 1990 Supersedes: January 1, 1989





Financial Policy and Standard Practice

**Docket No. 94-02** Page 3 of 4

No. Page:

Effective: Effective: January 1, 1990 Supersedes: January 1, 1989

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Docket No. 94-02 Page 4 of 4

#### Financial Policy and Standard Practice

J-301 1.301 4.27 4.27 January 1, 1990 Superseces: January 1, 1989 (P)

Telephone Operations
Administrative Series

Documents exempt from 110.07 f.s. Pending commission 25-22.006 ruling Practice 003-106-000 Issue 1, January 1994

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23-1

BILLING AND COLLECTION SERVICES
SUMMARY OF PURCHASE ORDER CHARGES
BILLED BY GTEDS ON BEHALF OF GTE FLORIDA
FOR INVOICES DATED 12/01/95
(GIX\INVSCH\GTFQ)

**REDACTED** 

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#### **REDACTED**

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing Request for Confidential Classification and Motion for Permanent Protective Order were sent via overnight delivery on January 31, 2000 to:

Cathy Bedell, General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Noreen Davis, Director of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Kimberly Caswell