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March 17, 2000

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

Re:

Docket No. 990362-TI

Initiation of Show Cause Proceeding Against GTE Communications

Corporation for Apparent Violation of Rule 25-4.118, F.A.C., Local, Local Toll,

or Toll Provider Selection

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of a Notice of Service of GTE Communications Corporation's Responses and Objections to Citizens' First Set of Requests for Production of Documents in the above matter. Also enclosed are an original and 15 copies of a Notice of Intent to Seek Confidential Classification. 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.

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A part of GTE Corporation

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FPSC-RECORDS/REPORTING

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause Proceeding Against GTE Communications Corporation for Violation of Rule 25-4.118, F.A.C., Local, Local Toll, or Toll Provider Selection E COMMISSION

Docket No. 990362-TI
Filed: March 17, 2000

## GTE COMMUNICATIONS CORPORATION'S NOTICE OF INTENT TO SEEK CONFIDENTIAL CLASSIFICATION

GTE Communications Corporation (GTECC) gives notice of its intent to seek confidential classification of the material produced to the Office of Public Counsel (OPC) in response to its First Set of Requests for Production of Documents served upon GTECC in this proceeding. This Notice exempts this material from section 119.07(1) of the Florida Statutes and section 24(a), Article I of the Florida Constitution and protects it from public disclosure. This information, concerning marketing of GTECC's services, falls within Florida Statutes section 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." 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 consumer.

If and when OPC notifies GTECC that it intends to use any of this confidential information at any hearing to be held in this case, GTECC will file an appropriate request for temporary protective order. If any of the information is

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admitted into the record at the hearing, GTECC will file a specific request for permanent protective order within 21 days after the hearing, in accordance with Commission rules 25-22.006(6)(c) and (8)(b).

Respectfully submitted on March 17, 2000.

By:

Kimberly Caswell

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Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for GTE Communications Corporation