

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of) Docket No. 990649-TP
Unbundled Network Elements, Phase II) Filed: May 1, 2000
_____)

**GTE FLORIDA INCORPORATED'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTE) seeks confidential classification and a protective order for certain information contained in Exhibit DBT-4 to the Direct Testimony of Dennis B. Trimble in this proceeding. While a ruling on this Request is pending, GTE understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). A highlighted, unredacted copy of the confidential material is attached to this request as Exhibit A. Redacted copies of the confidential material are attached as Exhibit B.

All of the information for which GTE seeks confidential treatment 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 information."

The confidential information at issue reveals GTE's wire-center-specific costs for 2-wire, 4-wire and DS-1 loops. This detailed information about GTE's costs at a geographically disaggregated level will give GTE's competitors an artificial advantage in fashioning their entry and expansion strategies in the most cost-effective manner. Disclosing wire-center-specific costs to GTE's competitors would, for instance, allow them to know where GTE might be most vulnerable to competition and what areas might be

This confidentiality request was filed by or for a "telco" for DN ~~05308-00~~ No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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unduly costly to serve. The information about wire center-specific line counts would, likewise, give competitors an artificial advantage in structuring their marketing plans to achieve the most successful market entry for the least cost.

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.

Respectfully submitted on May 1, 2000.

By: 
Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, Florida 33601
Telephone: 813/483-2617

Attorney for GTE Florida Incorporated