

GTE SERVICE CORPORATION

Tampa, Florida 33601-0110

813-204-8870 (Facsimile)

201 North Franklin Street (33602) Post Office Box 110, FLTC0007

One Tampa City Center

813-483-2606

Marceil Morrell*
Assistant Vice President &Associate General Counsel-East Area

Anthony P. Gillman* Assistant General Counsel

Florida Region Counsel**
Kimberly Caswell
M. Eric Edgington
Ernesto Mayor, Jr.
Elizabeth Biemer Sanchez

Certified in Floride se Authorized House Counsel
 Plante

August 24, 1998

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

Re: Docket No. 980696-TP

Determination of the cost of basic local telecommunications service, pursuant to Section 364.025, Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification regarding information included in certain exhibits to the direct testimonies of David G. Tucek and Meade C. Seaman in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost of Basic Local Telecommunications Service, Pursuant to Section 364.025, Florida Statutes Docket No. 980696-TP Filed: August 24, 1998

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 included in Exhibits DGT-1, DGT-2, and DGT-3, attached to David G. Tucek's Direct Testimony, and Exhibit MCS-2, attached to Meade C. Seaman's Direct Testimony. (GTE filed a Notice of Intent to Request Confidential Classification for these items on August 3, 1998.) While a ruling on the 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 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." If the information at issue were publicly disclosed, it would allow competitors to tailor their marketing, entry and expansion plans accordingly, avoiding much of the trial and error that is the hallmark of an openly competitive marketplace. In addition, some of the information

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covered by this Request is considered to be proprietary and confidential by GTE's thirdparty vendors, as well as by GTE.

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. As such, it is essential for the Commission to afford confidential treatment to the information described below in the following, line-by-line justification of confidentiality required by the Commission.

Exhibit DGT-1: (Company-Specific BCPM Inputs)

Page 19, lines 1-55, columns C-H; page 20, lines 56-91, columns C-H. These pages contain GTE's access line counts, by each of GTE's wire centers, broken down into residence, business single line, business multiline, special access, total business, and total access lines. These data, if publicly disclosed, would give GTE's actual and potential competitors a detailed snapshot of the size and composition of GTE's market at a level of geographic specificity that would be very useful in devising entry and marketing strategies.

Page 21, lines 1-55, columns C-H; page 22, lines 56-90, columns C-H: These pages show GTE's switching investments, by wire center, broken down into the following categories: processor-related; MDF and protection; line-port; line-CCS, trunk-CSS, and SS7. These data are confidential and proprietary to both GTE and to its third-party switch vendors. From GTE's perspective, the information on these pages, coupled with information about switches in particular offices, could demonstrate GTE's relative success in negotiations.

with its various switch vendors. From the vendors' perspective, these data will reveal the relative prices offered GTE by particular switch vendors. This kind of information, if disclosed publicly, can disrupt switch vendors' relationships with their customers and unfairly influence negotiations, which should be based solely on information legitimately obtained in the marketplace. In addition, GTE notes that the information at issue is governed by specific protective agreements (apart from GTE's customary protective agreement) when it is requested and turned over to intervenors.

Exhibit DGT-2: (BCPM3.1 CD)

This CD contains GTE's company-specific inputs as reflected in DGT-1 (i.e., access line counts, switch investments and the like). Thus, the same justifications that GTE offered above, in support of DGT-1, apply here, as well. GTE notes, however, that it cannot redact a CD (at least not if it is to remain usable) or do a line-by-line justification for a CD; thus, GTE has had to label the entire disk as confidential.

Exhibit DGT-3

Page 104, lines 1-40, columns B-E; page 105. lines 41-81, columns B-E; page 106, lines 82-90, columns B-E. This is the FCC Lines File input for BCPM. These pages reflect GTE's loops, by wire center, broken down into single business, multiple business, and non-switched working categories. This information is confidential and competitively sensitive for the same reasons GTE gave in association with Exhibit DGT-1, pages 19-20 (see above; in fact, much of the same information appears in both exhibits).

B-J; page 10, lines 1-26, columns B-E; page 11, lines 27-52, columns B-E; page 12, lines 53-78, columns B-E; page 13, lines 79-91, columns B-E. As witness Seaman notes in his Direct Testimony, BCPM calculates the cost of providing basic service on a per-line basis. The per-line figure for each wire center is compared to a revenue benchmark based on GTE's tariffs for local service. For wire centers where costs exceed the revenue benchmark, the difference is multiplied by the number of lines in that wire center to arrive at the total support required for that wire center. The sum of the supports for each wire center equals the total support amount shown in Mr. Seaman's Testimony. These pages reflect the detailed calculations, by wire center, and broken down into business and residential, and intrastate and interstate jurisdictions, supporting Mr. Seaman's total fund sizing number. These detailed, specific data would be useful for competitors in discerning the size and composition of GTE's market on a geographically disaggregated basis. The support information would reveal to competitors GTE's costs of serving particular areas and which areas would be the most lucrative. These data, if publicly disclosed, would give GTE's actual and potential competitors information that would help ensure their success in competing against GTE. This advantage, gained through the regulatory process, rather than operation of the market, would disrupt efficient competition.

Respectfully submitted on August 24, 1998.

By:

Kimberly Caswell

Post Office Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813/483-2617

Attorney for GTE Florida Incorporated

GTE FLORIDA INCORPORATED

BCPM Version 3.1 Inputs

Business

Docket No. 980496-TP

Dir. Test of D. G. Tucok

Exhibit DGT-1 FPSC Exhibit No.

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GTE FLORIDA INCORPORATED **BCPM Version 3.1 Inputs**

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Docket No. 980696-TP Dir. Test. of D. G. Tucok Exhibit DGT-1 FPSC Exhibit No.

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Exhibit DGT-1 PPSG Exhibit No. Poge 22 of 22

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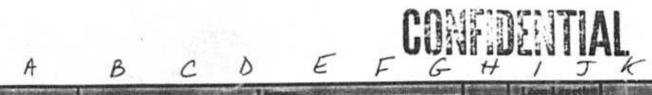
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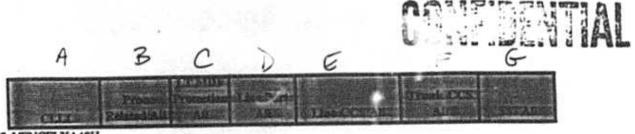
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V& NRPTFLXA								
4/5 NRSDFLXA								
SOLDSFLXA								
S OSPRFLXA								
SYPKCYFLXA	_							

ς.	2	الم الم	Δ	W	T	Ь	t	-\
	Avg. Monthly	Adjusted	1	Single Bus	\$Tot Res	\$Tot Bus Rate	Supported Res Lines	Supported Bus Lines
CLLI	Cost / Line	Monthly Cost	Nes Lines					
PLMIFLY								
7 PLSLFLXA								
5 PNCRFLXA								
PNLSFLXA								
7 POINFLXA								
ST PRSHFLXA								
? PSDNFLXA								
. PTCYFLXA								
" RSKNFLXA								
62 SARKFLXA								
3 SEKYFLXA								
6Y SGBEFLXA								
65 SKWYFLXA								
(4 SLSPFLXA								
C7SMNLFLXA								
6 SNSPFLXA								
64 SPBGFLXA	N.							
76 SPBGFLXS								
71 SPRGFLXA								
72SRSTFLXA								
73 SSDSFLXA								
4 STGRFLXA								
25 SWITHFLXA								
76 TAMPFLXE								
"TAMPFLXX								
18THNTFLXA								

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A	0	J		W	1	9	±	1-1
T CFT	Avg. Montaly Cost / Line	Adjusted Monthly Cost	Res Lines	Single Bus Lines	\$Tot Res Rate	\$Tot Bus Rate	Supported Res Lines	Supported Bus Lines
21 TMTRFLXA								
IN TRSPFLXA								
Y UNVEFLXA								
82 VENCFLXA								
& VENCFLXS								
SY WIMMFLXA								
S MICHELYA								
SF WICRFLYA								
87 WANTANFLXC								
88 WSSDFLXA								
1° YBCTFLXA								
92 ZPHYFLXA								
7/ TOTALS								

	29 01 2
\$ Total infrastate Support: Res + Bus	
\$ Tot intrastate Support: Bus	
\$ Tot Intrastate Support: Res	
\$ Total Interstate Support: Res + Bus	
\$ Total Interstate Support:	
\$ Total \$ linterstate int Support: Su Res	
\$ Total Support:	
\$ Total Support.	
\$ Total Support: Res	
₩	ABDLFLXA ALTRFLXA ANMRFLXA BARTFLXA BARTFLXA BARTFLXA BARTFLXA BARTFLXA BARTFLXA

6 BAYUFLXA
7 BBPKFLXA
6 BRJTFLXA
6 BRJTFLXA
7 BRNDFLXA
7 BRNDFLXA
7 CLWRFLXA
7 CLWRFLXA
7 CWDFLXA
7 CYGRFLXA
7 CHSDFLXA
7 HASDFLXA

g 3 5 4	20	13:	10	IR:
U	163	لأبتأ أستان	1 23	A

6	\$ Total Intrastate Support: Res + Bus
/	\$ Tot Intrastate Support: Bus
±	\$ Tot Intrastate Support: Res
9	\$ Total Interstate Support: Res + Bus
П	\$ Total Interstate Support: Bus
ואו	\$ Total interstate Support: Res
А	\$ Total Support: Res + Bus
U	\$ Total Support: Bus
Ð	\$ Total Support: Res
А	п

24 HYPKFLXA
35 INLKFLXA
36 INRKFLXA
37 KYSTFLXA
37 KALFLXA
37 LKALFLXA
47 LRGOFLXA
47 LRGOFLXA
47 MREYFLXA
47 MREY

h	\$ Total Intrastate Support: Res + Bus	
'	\$ Tot intrastate Support: Bus	
±	\$ Tot Intrastate Support: Res	
5	\$ Total Interstate Support: Res + Bus	
(1	\$ Total Interstate Support: Bus	
M	\$ Total Interstate Support: Res	
Q	\$ Total Support: Res + Bus	
U	\$ Total Support Bus	
4	\$ Total Support: Res	
Æ.	E	MTFUXA

53 PLATTELYA 54 PLSEFLYA 55 PRISEFLYA 57 PRISHFLYA 57 PRISHFLYA 64 SERYFLYA 64 SERYFLYA 64 SERYFLYA 64 SERYFLYA 64 SERYFLYA 65 SKWFLYA 67 SKWFLYA 68 SPEGFLYA 67 SKWFLYA 68 SPEGFLYA 67 SKWFLYA 68 SPEGFLYA 68 SPEGFLYA 68 SPEGFLYA 68 SPEGFLYA 68 SPEGFLYA 69 SPEGFLYA 67 SKWFLYA 68 SPEGFLYA 68 SPEG

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Meade Seaman
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FPSC Exhibit No.
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			97	5			,			-	7	
b	\$ Total Intrastate Support: Res + Bus			73		\$*)			3			-
,	\$ Tot intrastate Support: Bus											
t	\$ Tot intrastate Support: Res											
9	\$ Total Interstate Support: Res + Bus											
丁	\$ Total Interstate Support: Bus											
W	\$ Total Interstate Support Res											
0	\$ Total Support: Res + Bus											
U	\$ Total Support: Bus											
D	\$ Total Support: Res											
I.	Ē	74 TMTRFLXA	# UNVRFLXA	83 VENCFLXS	SCP WIMMFLXA	SC WICHELYA	SP- WICRFLXA	27 WAHNFLXC	SY WSSDFLXA	55 YBCTFLXA	SO ZPHYFLXA	9/ TOTALS

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₹	D	J	0	'n	
Ę	interstate Supported Res Lines	Interstate Supported Bus Lines	Intrastate Supported Res Lines	Intrastate Supported Bus Lines	
ABDLFLXA					
ALFAFLXA					
3 ALTRFLXA					
N ANMRFLXA					
BARTFLXA					
6 BAYUFLXA					
7 BBPKFLXA					
8 BHPKFLXA					
9 BRBAFLXA					
IS BRJTFLXA					
II BRNDFLXA					
IN BRTNFLXX					
13 BYSHFLXA					
14 CLWRFLXA					
IS CNSDFLXA					
16 CRWDFLXA					
17 CYGRFLXA					
PDNDNFLXA					
4 DUNDFLXA					
20 ENWDFLXA					
2/ FHSDFLXA					
12 FRSTFLXA					
33 GNDYFLXA					
24 HDSNFLXA					
2 HGLDFLXA					
36 HNCYFLXA					

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• •	Interstate apported Res		1	
27 HNCYFLXN 24 HYPKFLXA 34 ININGFLXA 34 ININGFLXA 37 KYSTFLXA 32 LGBKFLXA 33 LKALFLXA 34 LKI DEI XA		Interstate Supported Bus Lines	Intrestate Supported Res Lines	Intrastate Supported Bus Lines
34 HYPKELXA 34 INEKELXA 34 KYSTFLXA 32 LGBKFLXA 33 LKALFLXA				
34 INEVELXA 34 KYSTFLXA 32 LGBKFLXA 33 LKALFLXA				
34 KYSTFLXA 34 KYSTFLXA 32 LGBKFLXA 33 LKALFLXA				
3/kYSTFLXA 32 LGBKFLXA 33 LKALFLXA				
32 LGBICFLXA 33 LKALFLXA				
33 LKALFLXA				
AX INCIDIT XA				
Comment of the second				
3/LKLDFLXE				
34LKLDFLXN				
3) LKM.FLXA				
3 YLKWI FLXE				
3 LLMMFLXA				
46 LNLKFLXA				
4/ LRGOFLXA				
42 LUTZFLXA				
47 MLBYFLXA				
W MNLKFLXA				
45 MYCYFLXA				
4/4 NGBHFLXA				
47NPRCFLXA				
4 NRPTFLXA				
49 NRSDFLXA				
9 OLDSFLXA				
SI OSPRFLXA				
SPKCYFLXA				

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upported R Supported B Interstate Supported Res 0

53 PLMTFLXA 54 PLSLFLXA 55 PNCRFLXA 53 PNLSFLXA

25SWTHFLXA 1 TAMPFLXE 12TAMPFLXX

7 STHINTFLXA

14STGRFLXA

4 SPBGFLXA 70 SPBGFLXS 71 SPRGFLXA 72SRSTFLXA 2) SSDSFLXA

65 SKWYFLXA

6 Y SGBEFLXA

63 SEINFLXA

PI RSKNFLXA 62 SARKFLXA

S' PRSHFLXA **PSDNFLXA** PTCYFLXA

\$7 POINFLXA

67 SMNLFLXA 6 SSNSPFLXA

PE SLSPFLXA

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	. 1												
W	Intrastate Supported Bus Lines												
9	Intrastate Supported Res Lines												
U	Interstate Supported Bus Lines												
0	Interstate Supported Res Lines												
P	8	74 TMTRFLXA	P. UNVRELXA	8 A VENCFLXA	13 VENCFLXS	87 WIMMELXA	85 MICHELXA	SE WICHELYA	S WARRIETXC	FFWSSDFLXA	f TYBCTFLXA	POZPHYFLXA	97 TOTALS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification regarding certain exhibits to the direct testimonies of David G. Tucek and Meade C. Seaman in Docket No. 980696-TP were sent via U.S. mail on August 24, 1998 to the parties on the attached list.

Bun Kimberly Caswell

William P. Cox, Staff Counsel Elorida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400 Michael A. Gross Assistant Attorney General Office of the Attorney General PL-01 The Capitol Tallahassee, FL 32399-1050

David B. Erwin Attorney-At-Law 127 Riversink Road Crawfordville, FL 32327

Charles Rehwinkel Sprint-Florida Inc. 1313 Blair Stone Road MC FLTH00107 Tallahassee, FL 32301 Nancy White BellSouth Telecomm. Inc. 150 S. Monroe Street Suite 400 Tallahassee, FL 32301-1556

Jeff Wahlen Ausley & McMullen 227 S. Calhoun Street Tallahassee, FL 32301 Tracy Hatch/Marsha Rule AT&T 101 N. Monroe Street, #700 Tallahassee, FL 32301 Richard Melson Hopping Law Firm P. O. Box 6526 Tallahassee, FL 32314

Peter Dunbar/Barbara Auger Pennington Law Firm P. O. Box 10095 Tallahassee, FL 32302 Thomas Bond MCI Telecomm. Corp. 780 Johnson Ferry Rd., #700 Atlanta, GA 30342 Donna Canzano Wiggins & Villacorta P. O. Drawer 1657 Tallahassee, FL 32302

Benjamin Fincher Sprint 3100 Cumberland Circle Atlanta, GA 30339 Floyd R. Self Norman H. Horton, Jr. Messer Law Firm 215 S. Monroe Street, Suite 701 Tallahassee, FL 32301-1876 Brian Sulmonetti WorldCom, Inc. 1515 S. Federal Highway Suite 400 Boca Raton, FL 33432

Carolyn Marek Time Warner Comm. P. O. Box 210706 Nashville, TN 37221 James C. Falvey e.spire™ Communications, Inc. 133 National Business Parkway Suite 200 Annapolis Junction, MD 20701 Laura L. Gallagher Florida Cable Tele. Assn. 310 N. Monroe Street Tallahassee, FL 32301

Lynne G. Brewer Northeast Florida Tel. Co. P. O. Box 485 Macclenny, FL 32063-0485 Harriet Eudy ALLTEL Florida, Inc. P. O. Box 550 Live Oak, FL 32060 Lynn B. Hall Vista-United Telecomm. P. O. Box 10180 Lake Buena Vista, FL 32830 Robert M. Post, Jr. P. O. Box 277 Indiantown, FL 34956 Tom McCabe P. O. Box 189 Quincy, FL 32353-0189 Mark Ellmer P. O. Box 220 502 Fifth Street Port St. Joe, FL 32456

Kelly Goodnight Frontier Communications 180 S. Clinton Avenue Rochester, NY 14646 Steve Brown Intermedia Comm. Inc. 3625 Queen Palm Drive Tampa, FL 33619-1309 Kenneth A. Hoffman John R. Ellis Rutledge Law Firm P. O. Box 551 Tallahassee, FL 32301

Paul Kouroupas/Michael McRae Teleport Comm. Group. Inc. 2 Lafayette Centre, Suite 400 1133 21st Street, N.W. Washington, DC 20036 Suzanne Summerlin 1311-B Paul Russell Road Suite 201 Tallahassee, FL 32301 Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter Law Firm 117 S. Gadsden Street Tallahassee, FL 32301

Ben Ochshorn Florida Legal Services 2121 Delta Boulevard Tallahassee, FL 32303