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September 29, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: Docket No. 960786-TL

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Teleport Communications Group Inc. ("TCG") are the original and fifteen copies of TCG's Request for Confidential Classification of Frank Hoffman's Late-Filed Hearing Exhibit No. 120.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

William B. Willingham
William B. Willingham

WBW/rl

Enclosures

cc: All Parties of Record

RECEIVED & FILED

Matilda

FLORIDA DIVISION OF RECORDS

for DN 09465-97
DOCUMENT NUMBER-DATE

09947 SEP 29 1997

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- ACK
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- WAS
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)
Telecommunications, Inc.'s entry)
into interLATA services pursuant)
to Section 271 of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL

Filed: September 29, 1997

**TELEPORT COMMUNICATIONS GROUP INC.'S
REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF FRANK HOFFMANN'S
LATE-FILED HEARING EXHIBIT NO. 120**

Teleport Communications Group Inc. ("TCG"), by and through its undersigned counsel and pursuant to Section 364.183, Florida Statutes, and Rules 25-22.006(4) and (5), Florida Administrative Code, submits this Request for Confidential Classification of portions of Frank Hoffmann's Late-filed Hearing Exhibit No. 120 in the above-styled docket. In support of this Request, TCG states as follows:

1. On September 10, 1997, during the hearing in the above-styled docket, the Staff of the Florida Public Service Commission requested that TCG's witness Frank Hoffmann provide a late-filed exhibit, identified as Exhibit No. 120, that documents each time that TCG informed BellSouth Telecommunications, Inc. of traffic changes and the reason for the change. TCG maintains that certain information in Late-filed Hearing Exhibit No. 120 is confidential and proprietary.

2. Late-filed Hearing Exhibit No. 120 identifies the name of customers who have initiated service with TCG since January, 1997, the geographic location of those customers

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and the number of trunks that are required to serve these customers. This information directly relates to TCG's competitive interests. Disclosure of this information would impair TCG's competitive business interests by allowing competitors to determine the amount of traffic being transmitted over TCG's network and by providing TCG's competitors with the name and geographic location of significant TCG customers. This information is intended to be and is treated by TCG as proprietary and confidential. TCG notes that the Commission already has determined in this docket that the number of trunks that an ALEC utilizes in Florida is entitled to the protection of Section 364.183(3), Florida Statutes. See Order No. PSC-97-1039-CFO-TL, issued on September 2, 1997. TCG requests that this information be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes.

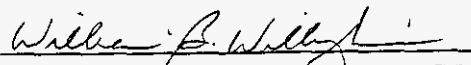
3. An unedited version of Mr. Hoffmann's Late-filed Hearing Exhibit No. 120, with the information asserted to be confidential highlighted in yellow, was submitted to the Division of Records and Reporting on September 17, 1997 in conjunction with TCG's Notice of Intent to Request Confidential Classification of same. An edited version of the documents with the information asserted to be confidential blocked out is enclosed herewith.

4. TCG requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 364.183(4), Florida Statutes.

WHEREFORE, for the foregoing reasons, TCG respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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REQUEST: Identify the dates when Teleport notified BellSouth of traffic changes and the reason for the traffic changes

RESPONSE:

DATES WHEN TELEPORT NOTIFIED BELL SOUTH OF TRAFFIC CHANGES

January 9, 1997 Teleport ordered [REDACTED] additional trunks from BellSouth's [REDACTED] Tandem for the purpose of turning up [REDACTED] an Internet Service Provider ("ISP").

January 14, 1997 Teleport ordered [REDACTED] more trunks from BellSouth's [REDACTED] Tandem for the purpose of turning up [REDACTED] bringing the order total to [REDACTED] trunks.

February 1997 Teleport notified BellSouth of complaints that calls from BellSouth's end users to Teleport's end users were being blocked in the [REDACTED] area (especially in the [REDACTED] exchange).

April 1997 Teleport escalated its [REDACTED] area blocking complaint to BellSouth, specifically to Keith Andrews, Operations Director of the Access Customer Advocate Center.

May 7, 1997 Teleport notified BellSouth that Teleport would turn up two ISP providers before the end of June, one provider in [REDACTED] and another provider in [REDACTED]. Teleport ordered [REDACTED] additional trunks for [REDACTED] and [REDACTED] additional trunks for [REDACTED].

REASONS FOR TRAFFIC CHANGES

- January 14, 1997 Teleport turned up [REDACTED]. BellSouth turned up additional trunks on February 14, 1997.
- May 7, 1997 BellSouth informed Teleport that the blocking of calls in the [REDACTED] area was due to BellSouth's incorrect routing of calls to Teleport, due in large part to heavy overflows between BellSouth's tandems in the [REDACTED] area. BellSouth resolved the problem by increasing the number of trunks between the [REDACTED] tandem and Teleport from [REDACTED] to [REDACTED] on or about May 12, 1997.
- June 27, 1997 An ISP was turned up in [REDACTED]
- June 27, 1997 An ISP was turned up in [REDACTED]

INFORMATION PROVIDED BY: Frank R. Hoffmann
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 29th day of September, 1997:

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