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October 6, 1997

GOVERNMENTAL CONSULTANTS. PATRICK & MALOY AMPY J YOUNG

HAND DELIVERY

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

170000

In re: Florida Public Service Commission Staff Data Request concerning status of Re: local exchange competition - undocketed

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 Response to Staff Data Request.

AFA -Please acknowledge receipt of these documents by stamping the extra copy of this letter APP \_\_\_\_\_filed" and returning the same to me.

Sincerely,

Thank you for your assistance with this filing.

CAF \_\_\_\_

ACK

CMU \_\_\_\_

CTR \_\_\_\_

EAG \_\_\_\_\_

LEG \_\_\_\_

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Enclosures 2016

> All Parties of Record CC:

DOCUMENT NUMBER-DATE 10235 OCT-65

FPSC-RECORDS/REPORTING

# ORIGINAL

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Public Service Commission Staff Data Requests concerning status of local exchange competition.

Undocketed

Filed: October 6, 1997

### TELEPORT COMMUNICATIONS GROUP INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF RESPONSE TO STAFF DATA REQUEST

Teleport Communications Group Inc. ("TCG"), by and through its undersigned counsel, and pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006(4) and (5)(a), Florida Administrative Code, hereby files its Request for Confidential Classification of TCG's Response to the Florida Public Service Commission Staff's September 11, 1997 data request in the abovereferenced matter. In support of this request, TCG states as follows:

By letter dated September 11, 1997, the Staff of the Florida Public Service
Commission requested TCG to provide exchange-specific data reflecting the number of business
and residential access lines served by TCG in Florida. The purpose of Staff's data request was to
acquire information on the development of local exchange competition to be used by the
Commission in the preparation of the Commission's annual report to the Legislature on the status
of competition in the telecommunications industry. See §364.386(1), Fla.Stat.

 On September 17, 1997, TCG provided the requested confidential information to the Commission staff and filed contemporaneously therewith a Notice of Intent to Request Confidential Classification.

DOCUMENT NUMBER-DATE

3. The information provided by TCG pursuant to Staff's request includes the number of TCG business access lines by rate center in Florida as of August, 1997. This information directly relates to TCG's competitive interests. Public disclosure of this information to TCG's competitors would impair TCG's competitive business interests by allowing competitors to ascertain the approximate number of business customers and the general location of such customers served by TCG in Florida. This information is intended to be and is treated by TCG as proprietary and confidential. The Commission already has determined that the number of trunks that an alternative local exchange company (such as TCG) utilizes in Florida is entitled to the protection of Section 364.183(3), Florida Statutes. See Order No. PSC-97-1039-CFO-TL issued 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.

4. An unedited version of TCG's response to Staff's data request, 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. An edited version of the document with the information asserted to be confidential redacted also was attached to the Notice of Intent.

5. 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, unless the Commission orders the return of such proprietary confidential business information to TCG prior to the expiration of the statutory 18 month period, or returns or destroys the documents provided by TCG pursuant to the notice of termination procedures set forth in Rule 25-22.006(2)(b), Florida Administrative Code ("Material obtained during an

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inquiry").

WHEREFORE, for the foregoing reasons, TCG respectfully requests that its Request for

Confidential Classification be granted.

Respectfully submitted,

KENNETH A/HOFFMAN, ESQ. WILLIAM B. WILLINGHAM, ESQ. Rutledge, Ecenia, Underwood, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, FL 32302 (850) 681-6788 (Telephone) (850) 681-6515 (Fax)

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Teleport Communications Group Inc.'s Request for Confidential Classification of Response to Staff Data Request was furnished by hand delivery to the following this 6th day of October, 1997:

Martha Carter Brown, Esq. Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Gerald Gunter Building Tallahassee, FL 32399

Ms. Laura King Florida Public Service Commission 2540 Shumard Oak Boulevard Room 270A Gerald Gunter Building Tallahassee, FL 32399

HA DOFFMAN, ESQ.

TCO.de

Gulf Power Company Response to Audit 97-190-1-1 Investigation of Cost Associated with Utility Web Sites

#### Response to Audit Disclosure No. 1

The Company does not agree with the staff recommendation. The Company does not consider the information included on Gulf's web pages to be image enhancement material. The information posted to the web is simply a compilation of articles, news releases and other information necessary to keep our employees and customers informed. The cost of posting the information on the web site is far less than producing the same information on brochures, publications or other means of distribution. More and more information is being distributed using the web and network in order to reduce costs.

Even if these costs were image enhancement costs, the Company does not agree with the recommendation that image enhancement amounts should be charged to FERC 426, as a non-operating expense. Actually, utility related image enhancement advertising costs are charged to FERC 930. The FPSC disallowed image enhancement advertising in our last rate case, and these amounts are adjusted out of jurisdictional net operating income in the monthly surveillance report.