

SIDNEY J. WHITE, JR.
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-5094

November 5, 1992

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. 920260-TL

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Sidney J. White, Jr.

Sidney J. White, Jr.

Enclosures

cc: All Parties of Record
A. M. Lombardo
H. R. Anthony
R. D. Lackey

Jan

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13064 NOV-5 1992
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CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished
by United States Mail this 5th day of November, 1992 to:

Robin Norton
Division of Communications
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Michael J. Henry
MCI Telecommunications Corp.
MCI Center
Three Ravinia Drive
Atlanta, Georgia 30346-2102

Angela Green
Division of Legal Services
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
716 - 315 S. Calhoun Street
Tallahassee, Florida 32301
atty for FIXCA

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia

Peter M. Dunbar
Haben, Culpepper, Dunbar
& French, P.A.
Post Office Box 10095
Tallahassee, FL 32301
atty for FCTA

Joseph Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, Florida 32854-1038

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for US Sprint

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
Suite 1410
106 East College Avenue
Tallahassee, Florida 32301

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
Room 812, 111 W. Madison Street
Tallahassee, FL 32399-1400

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson,
& Dickens
2120 L Street, N.W.
Washington, DC 20037

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd. #128
Tampa, FL 33609

Mr. Cecil O. Simpson
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Advocate General
Department of the Army
901 North Stuart Street
Arlington VA 22203-1837

Michael B. Twomey
Assistant Attorney General
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Bill L. Bryant, Jr., Esq.
Foley & Lardner
Suite 450
215 South Monroe Street
Tallahassee, FL 32302-0508

Douglas S. Metcalf (Ad Hoc)
Communications Consultants, Inc.
1600 E. Amelia Street
Orlando, FL 32803

Thomas F. Woods, Esq.
Gatlin, Woods, Carlson, and
Cowdery
1709-D Mahan Drive
Tallahassee, FL 32308
atty for the Florida Hotel and
Motel Association

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gadsen Street
Tallahassee, FL 32302

Sidney J. White, Jr.
(02)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: November 5, 1992
Company (Formerly FPSC Docket)
Number 880069-TL))
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Request for Confidential Classification for certain information contained in documents provided in response to Staff's Fifth Request for Production of Documents dated October 15, 1992.

1. Southern Bell is filing its Request for Confidential Classification for portions of documents produced for Staff which contain customer-specific information, strategic market information, information on competitive services, and other Company proprietary confidential business information.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the documents of the information designated by Southern Bell as confidential.

3. Appended hereto in a package designated as Attachment B are two edited copies of the documents with the confidential information deleted.

4. Attached as Attachment C is a sealed package containing copies of the documents with the material which is confidential

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and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

5. With respect to documents produced for Staff in response to Request No. 100, the documents contain mileage-band specific demand information relating to the competitive intraLATA toll market. This information is entitled to confidential classification on the basis that it is information relating to competitive interests, the disclosure of which would impair Southern Bell's competitive intraLATA toll business if publicly disclosed. Section 364.183(3)(e), Florida Statutes, specifically provides that such information is proprietary confidential business information. The intraLATA toll market is competitive in the State of Florida. Interexchange carriers (IXCs) and resellers both compete with Southern Bell for intraLATA toll customers. Demand information on a specific mileage-band basis would be extremely valuable to Southern Bell's competitors. Knowledge of which mileage-bands correspond with the highest levels of Southern Bell's intraLATA toll traffic would enable the Company's competitors to target these same mileage-bands for decreased rates and special promotional offers designed to take customers away from Southern Bell. Obviously, if Southern Bell's competitors gain a competitive advantage through the use of Southern Bell's market demand information, such advantage will inure to the detriment of Southern Bell and ultimately its ratepayers. IntraLATA toll rates have historically provided valuable contribution to decrease the upward pressure otherwise exerted on basic local exchange rates. A loss of a portion of

this contribution could accelerate the need for increases in such basic rates. Finally, Southern Bell should not be compelled to share its market information, demand analyses, and other competitive analyses with its competitors because this information is valuable, and was compiled by Southern Bell to analyze the intraLATA toll market. Southern Bell's competitors should not be given free use of such information. These competitors have the necessary resources and ability to determine market demand for the relevant markets, and should be required to independently conduct and fund these efforts.

6. With respect to documents produced for Staff in response to Request No. 101, the documents contain proprietary customer-specific network service information. This information is entitled to confidential classification on the basis that it is information relating to identifiable customers and the specific services provided by the Company to these customers. The Commission has always zealously protected customer-specific information from public disclosure in order to protect the customers' legitimate expectations of privacy and confidentiality of these records. Also, to the extent that this information is considered to be Customer Proprietary Network Information (CPNI), pursuant to existing federal and state CPNI rules Southern Bell is restricted in the manner in which it discloses such information to other parties as well as to certain of its internal marketing personnel. Consequently, it would be anomalous if Southern Bell were compelled to publicly disclose

information which it is otherwise restricted from disclosing pursuant to the existing CPNI rules.

7. Southern Bell has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, Southern Bell moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 5th day of November, 1992.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony

HARRIS R. ANTHONY
PHILLIP J. CARVER
c/o Marshall M. Criser
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Luckey
R. DOUGLAS LUCKEY
SIDNEY J. WHITE, JR.
4300 - 675 West Peachtree St.
Atlanta, Georgia 30375
(404) 529-5094

FPSC DOCKET 920260-TL
FPSC STAFF'S 5TH REQUEST FOR DOCUMENTS

LOCATION OF THE PROPRIETARY INFORMATION

Page Number	Line/Column	Reason
F01B05Z		
0000002	All figures Col B-I	1
0000003-0000005	All figures Col B-I	1
0000006	Lines 1 & 2	1
0000007	All figures Col B-I	1
0000057	Col A	4
0000058	Col A	4
0000059	Col A	4
0000060	Col A	4
0000061	Col A	4
0000062	Col A	4
0000063	Col A	4
0000065	Col A	4
0000066	Col A	4
0000067	Col A	4
0000068	Col A	4
0000070	Col A	4
0000071	Col A	4
0000073	7,10	4
0000074	7,9	4
0000075	7,9	4
0000076	7,9	4
0000077	7,10	4
0000078	7,10	4
0000079	7,9	4
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0000091	7,10	4
0000092	7,9	4
0000093	7,10	4
0000094	7,10	4
0000095	7,9	4

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LOCATION OF THE PROPRIETARY INFORMATION

Page Number	Line/Column	Reason
F01B05Z Continued		
0000096	7,10	4
0000097	7,10	4
0000098	7,10	4
0000099	7,10	4
0000100	7,10	4
0000102	7,10	4
0000103	7,10	4
0000104	7,10	4
0000105	7,9	4
0000106	Col A,B,D	4
0000107	Col A,B,D	4
0000108	Col A,D	4
0000109	Lines 1-25, Col A	4
	Lines 16,20,21, Col D,E	4
	Line 20, Col M-O	4
0000111-0000181	Col G	4

EXPLANATION OF PROPRIETARY DESIGNATION

1. This information reflects projected units and/or revenues for competitive services and, therefore, demand for certain Southern Bell services. If this information were given to a competitor he would know how much growth Southern Bell expects in a particular service, thus telling the competitor he too should begin offering these services. This information is valuable, and is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes. In addition, this information represents research performed by Southern Bell which should not be given free of charge to entities which compete with Southern Bell. Southern Bell compiled and developed this information in order to assist it in analyzing this subject matter. Southern Bell's competitors should not be allowed to benefit from research performed at Southern Bell's expense.
2. This information provides Southern Bell's allocation of vendor products by dollar and access line level, both actual and forecasted. Public disclosure of this information could harm Southern Bell's ability to contract for the most efficient prices by allowing the vendor to compute Southern Bell's requirements for that vendor's services.
3. This information reflects Southern Bell's market strategy. Southern Bell's competitors can use this information to develop their own market strategy with which to thwart Southern Bell's effort in this market. Thus, the disclosure of this information to Southern Bell's competitors would impair Southern Bell's ability to compete. In addition, this information is valuable, it is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183 Florida Statutes.
4. This information reflects customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage.
5. This information reflects where, when and how much digital and/or fiber optic facilities Southern Bell intends to place. Competitors who offer fiber and/or digital based services can use this information to "beat" Southern Bell to the market. Thus, the disclosure of this information to Southern Bell's competitors would impair Southern Bell's ability to compete. In addition, this information is valuable, it is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183, Florida Statutes.

6. This information reflects vendor specific pricing negotiated by Southern Bell. Public disclosure of this information would impair Southern Bell's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
7. This information reveals other state or other company information.
8. This information reflects Southern Bell's cost to provide certain services. The public disclosure of this information would provide Southern Bell's competitors with an advantage in that they would know the price or rate below which Southern Bell could not provide the service. Southern Bell is not able to obtain its competitor's cost to provide service, therefore, it would be inequitable and unfair for Southern Bell's competitors to have access to Southern Bell's cost information. In addition, this information is valuable, it is used by Southern Bell in conducting its business and Southern Bell strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.