



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400  
904-488-9330

ORIGINAL  
FILE COPY

March 29, 1991

Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32399-0850

Re: Docket No. 910060-TP

Dear Mr. Tribble:

Enclosed for filing in the above-captioned proceeding on behalf of the Citizens of the State of Florida are the original and 12 copies of Citizens' Opposition of the Attorney General and the Citizens to MCI's Request for Confidential Classification to be filed in this docket.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Enclosure

- ACK   ✓
- AFA
- APP   1
- CAF
- CMU   1
- CTR
- EAG
- LEG
- LIN   6
- OPC
- RCH   1
- SEC   1
- WAS
- OTH

Sincerely,

Darlene Driscoll

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03091 MAR 29 1991

EPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of the Attorney )  
General and the Public Counsel ) Docket No. 910060-TP  
to adopt rules governing 900 ) Filed: March 29, 1991  
services )  
\_\_\_\_\_ )

**OPPOSITION OF THE ATTORNEY GENERAL AND THE CITIZENS TO  
MCI'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

The Attorney General of Florida ("Attorney General") and the Citizens of Florida ("Citizens") file this opposition to the request for confidential classification filed by MCI Telecommunications Corporation ("MCI") on March 20, 1991.

1. On February 19, 1991 the Florida Public Service Commission staff requested MCI to provide the names and addresses of its 900 information providers so that the requested information could be noticed and included in an economic impact study.

2. By letter dated March 20, 1991 MCI filed a request for confidential classification. MCI argues that a compiled list of all its customers constitutes a trade secret, yet MCI recognizes that "... a retail customer of MCI (or a competitor) may be able to identify one or more of the entities shown on the customer list by a review of MCI or LEC billing statements." See MCI March 20, 1991 request for confidential classification at 3.

3. This Commission requires the name of information service providers to appear on the bill provided to any customer of 900 services. Anyone -- competitor or not -- can call 900 numbers and, after receiving a billing statement, learn the names of each of the information service providers. This is the "customer" whose identity MCI does not wish to be available to the public in a compiled list. The information is no trade secret because it is so readily available to anyone willing to call the 900 numbers.

4. MCI's request also goes against the thrust of a rule recently proposed by the FCC. According to a Wall Street Journal article appearing on Friday, March 15, 1991, the Federal Communications Commission proposed a rule on March 14, 1991 that would require long distance carriers to disclose the name, address, and customer service number of any 900 service provider to any customer who asked for the information.

5. 976 services are similar to 900 services, although transport is provided by a local exchange carrier rather than an interexchange carrier. No company providing transport to these information service providers claimed in this proceeding that a compiled list of these providers would be confidential.

6. While couched in the terms of a compiled "customer" list, the names MCI does not wish to be available to the public at large are simply those entities charging fees to customers for dialing

900 numbers. This information is available now by calling 900 numbers and reviewing subsequent billing statements. There is no reason the compiled information should not be available to the public.

WHEREFORE, the Attorney General and the Citizens respectfully request the Commission to deny MCI's request for confidential classification filed on March 20, 1991.

ROBERT A. BUTTERWORTH  
ATTORNEY GENERAL

*Patricia R. Gleason / gB*

Patricia R. Gleason  
General Counsel

Department of Legal Affairs  
The Capitol  
Tallahassee, FL 32399-1050

(904) 487-1963

JACK SHREVE  
PUBLIC COUNSEL

*Charles J. Beck*

Charles J. Beck  
Assistant Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

(904) 488-9330

**CERTIFICATE OF SERVICE  
DOCKET NO. 910060-TP**

I HEREBY CERTIFY that a correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 29th day of March, 1991.

Harris Anthony  
Southern Bell Telephone and  
Telegraph Company  
c/o Marshall Criser, III  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301

David Smith  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Thomas Parker  
GTE Florida Incorporated  
P.O. Box 110, MC 7  
Tampa, FL 33601

Floyd Self  
Messer, Vickers, Caparello,  
French, Madsen & Lewis  
P.O. Box 1876  
Tallahassee, FL 32302

Alan Berg  
United Telephone Company  
P.O. Box 5000  
Altamonte Springs, FL 32716

Joe Gillan  
Gillan Associates  
P.O. Box 541038  
Orlando, FL 32854-1038

Tracy Hatch  
Division of Legal Services  
Fla. Public Service Commission  
101 East Gaines Street  
Tallahassee, FL 32301

Michael Tye  
AT&T Communications  
Suite 1410  
106 East College Ave.  
Tallahassee, FL 32301

Richard Melson  
Hopping Boyd Green & Sams  
P.O. Box 6526  
Tallahassee, FL 32314

David Erwin  
Mason, Erwin, Horton  
1311-A Paul Russell, Suite 101  
Tallahassee, FL 32301

Lee Willis  
227 South Calhoun Street  
P.O. Box 391  
Tallahassee, FL 32302

Mickey Henry  
MCI  
400 Perimeter Center Terrace,  
N.E., Suite 400  
Atlanta, GA 30346

Joseph McGlothlin  
Lawson, McWhirter, Grandoff  
& Reeves  
522 E. Park Ave., Suite 200  
Tallahassee, FL 32301

Jean Kiddoo  
Telesphere Limited, Inc.  
Two Mid America Plaza, Suite 500  
Oakbrook, IL 60181

Robert A. Butterworth  
Attorney General  
Department of Legal Affairs  
The Capitol  
Tallahassee, FL 32399-1050

Ferrin Seay  
Floral Telephone Company  
522 North Fifth St.  
Floral, AL 36442

John Carroll  
Northeast Florida Telephone Co.  
130 North Fourth St.  
Macclenny, FL 32063-0485

Lila Corbin  
Quincy Telephone Company  
107 W. Franklin St.  
Quincy, FL 32351

Thomas E. Wolfe  
Southland Telephone Company  
201 South Pensacola Ave.  
Atmore, AL 36504

Patrick Wiggins  
Wiggins & Villacorta  
P.O. Drawer 1657  
Tallahassee, FL 32302

Dean Kurtz  
Central Telephone Company  
P.O. Box 2214  
Tallahassee, FL 32316

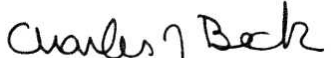
Harriet Eudy  
Alltel Florida, Inc.  
206 White Ave. S.E.  
Live Oak, FL 32060

A. Dewayne Lanier  
Gulf Telephone Company  
115 West Drew St.  
Perry, FL 32347

Charles Dennis  
Indiantown Telephone System  
15925 S.W. Warfield Blvd.  
Indiantown, FL 34956

Lynda Bordelon  
St. Joseph Telephone Co.  
502 Fifth St.  
Port St. Joe, FL 32456

Lynn Hall  
Vista-United Telecommunications  
3100 Bonnet Creek Rd.  
Lake Buena Vista, FL 32830

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Charles J. Beck  
Assistant Public Counsel