SIDNEY J. WHITE, JR. General Attorney

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

December 9, 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,

Enclosures

cc: All Parties of Record

A. M. Lombardo H. R. Anthony R. D. Lackey

CERTIFICATE OF SERVICE Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 9th day of December, 1992 to:

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Dishite)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company (Formerly FPSC Docket Number 880069-TL)

Docket No. 920260-TL

Filed: December 9, 1992

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 portions of certain Company responses to Staff's Thirteenth Set of Interrogatories dated November 4, 1992.

- 1. Southern Bell is filing its Request for Confidential Classification for Interrogatory Response No. 371, which contains certain information pertaining to competitive intraLATA toll services.
- 2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory responses of the information designated by Southern Bell as confidential.
- 3. Appended hereto in an envelope designated as
 Attachment B are two edited copies of the Interrogatory responses
 with the confidential information deleted.
- 4. Attached as Attachment C is a sealed envelope containing copies of the Interrogatory responses with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

DOCUMENT MUMBER-DATE

14304 DEC -9 1932

FPSC-RECORDS/REPORTING

- Regarding Southern Bell's response to Interrogatory Item No. 371, this response is entitled to proprietary confidential classification because it contains the statistical distribution of Southern Bell's intraLATA toll messages by mileage band, broken down by business, residence, public and "other" categories. This information discloses usage patterns for certain classes of Southern Bell customers and shows the representative mileage for intraLATA calls made by these customers. The intraLATA toll market is a competitive arena. Competitors could use this information to selectively target their marketing strategies and pricing to appeal to key customer bases, thereby depriving Southern Bell of similar business opportunities. Thus, the disclosure of this competitive toll market information would impair Southern Bell's ability to compete in the intraLATA toll market. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider. The information contained in Southern Bell's response to Item No. 371, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.
- 6. 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 9th day of December, 1992.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY (2)

J. PHILLIP CARVER

c/o Marshall M. Criser

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ATTACHMENT A Location of Proprietary Material

Southern Bell's Response to Item 371 of Staff's Thirteenth Set of Interrogatories

The material found on lines 30 through 42 on page 1 of Southern Bell's response to Item No. 371 in Staff's Thirteenth Set of Interrogatories is considered by Southern Bell to be proprietary and confidential in that this material deals competitive intraLATA toll market information.