Legal Department

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January 15, 1993

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 an 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, Nancy B.

Enclosures

cc: All Parties of Record

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

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FFSC-RECORDS/REPORTING

-DATE DOCUMENT NUMBER 00602 JAN 158 FPSC+RECORDS/REPORTING

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 15th day of January, 1993 to:

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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: January 15, 1993

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 the Company's Response to Item No. 533 of Staff's Twenty-Sixth Set of Interrogatories dated December 18, 1992.

1. Southern Bell is filing its Request for Confidential Classification for its Supplemental Response to Interrogatory Item No. 533 because it deems the information requested as confidential and proprietary business in that it reflects where, how much, and of what type fiber optic facilities will be provided. In that competitors who offer fiber-based services can use this information as a resource, disclosure of this information impairs Southern Bell's ability to compete.

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.

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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.

5. Regarding Southern Bell's Response to Interrogatory Item No. 533, this response is entitled to proprietary confidential classification. 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 Interrogatory Item No. 533, 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.

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Respectfully submitted this 15th day of January, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

ω HARRIS R. ANTHONY (04)

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ATTACHMENT "A"

FPSC DOCKET 920260-TL FPSC STAFF'S 26TH SET OF INTERROGATORIES ITEM NUMBER 533

JUSTIFICATION FOR CONTIDENTIALITY

Southern Bell deems the information requested as confidential and proprietary business information in that it reflects where, how much, and of what type fiber optic facilities will be provided. In that competitors who offer fiber-based services can use this information as a resource, disclosure of this information impairs Southern Bell's ability to compete.

LOCATION OF THE PROPRIETARY INFORMATION

The location of the proprietary information is identified by page and line numbers as follows:

Page Number(s)	Line Numbers
1	3, 6, 7, 11, 13, 16-19, 21, 22, 25, 27, 28, 30, 32, 34, 36, 39
2	3, 4, 8, 11, 13
3	Col C; lines 3-6, 12-19
4	Col B & C; lines 6-21
5	Col D, E, F; lines 5-50
6	Col D, E, F; lines 5-25
7	2, 4-10, 13, 16-19
8	3-18, 20-29
9	lines 6-55
10	lines 1-21
11	lines 1-36