

NANCY B. WHITE
General Attorney

Southern Bell Telephone
and Telegraph Company
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(404) 529-5387

January 20, 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. [REDACTED]

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.

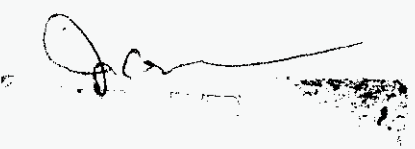
A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
Nancy B. White
(at)

Enclosures

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



DOCUMENT NUMBER-DATE

00811 JAN 20 83

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished
by United States Mail this 20th day of January, 1993 to:

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

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

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

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

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

Mr. Floyd R. Self
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302

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

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

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

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

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

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

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

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

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

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
202 - 8130 Baymeadows Cir. West
Jacksonville, FL 32256

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

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.
P.O. Box 1148
Winter Park, FL 32790-1148

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

Laura L. Wilson, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Mr. Michael Fannon
Cellular One
2735 Captial Circle, N.E.
Tallahassee, FL 32308

Nancy B White
(28)

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: January 20, 1993
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 the Company's Response to Item Nos. 129 and 130 of Staff's Fourteenth Request for Production of Documents dated November 25, 1992.

1. Southern Bell is filing its Request for Confidential Classification for its Responses to Item Nos. 129 and 130 because it deems the information requested as confidential and proprietary business in that it contains vendor-specific product and pricing information and other proprietary confidential business information. Disclosure of this information would impair Southern Bell's ability to contract for goods or services on favorable terms, as well as impair 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 Production of Document responses of the information designated by Southern Bell as confidential.

DOCUMENT NUMBER-DATE

00811 JAN 20 83

FPSC-RECORDS/REPORTING

3. Appended hereto in an envelope designated as Attachment B are two edited copies of the Production of Document responses with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing copies of the Production of Document 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 Production of Document Item Nos. 129 and 130, these responses are entitled to proprietary confidential classification. The disclosure of this vendor-specific product and pricing information would impair Southern Bell's ability to contract for goods and services on favorable terms. Section 364.183(3) and (d), Florida Statutes, expressly considers as proprietary confidential business information any information relating to contractual data, the disclosure of which would impair the competitive business of the provider. In addition, some of the information is proprietary confidential business information relating to competitive interests, the disclosure of which is prohibited by Florida Statutes § 364.183(e). The information contained in Southern Bell's Response to Production of Document Item Nos. 129 and 130, 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 20th day of January, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY


HARRIS R. ANTHONY (2)
J. PHILLIP CARVER
c/o Marshall M. Criser
400 - 150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555


R. DOUGLAS LACKEY (2)
NANCY B. WHITE
4300 - 675 West Peachtree St.
Atlanta, Georgia 30375
(404) 529-5387

FPSC DOCKET 920260-TL
FPSC STAFF'S 14TH'S PRODUCTION OF DOCUMENTS

EXPLANATION OF PROPRIETARY DESIGNATION

1. 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.

4. 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.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASONS</u>
F01B14Z00001	4-53, Cols. D-E	1
00002	4-54, Cols. D-E	1
00003	4-50, Cols. D-E	1
00004	17-26	1
00007	All graph numbers	1
00008	All graph numbers	1
00010	7, 15-19	1

F01B14Z00011	1, 8, 10, 11, 13, 15, 18, 19-22 27, 29, 32, 35-37, 39, 40	1
00012	All graph numbers	1
00013	All graph numbers	1
00015	All graph numbers	1
00017	8, 12-27	1
00018	1-13	1
00029	28-30	1
00037	13-17, 21-23	1
00039	17-19	1
00042	13-17, 23-24	1
00043	8-11, Cols. D-E	1
00064	17-19	1
00067	14-16, 23-24	1
00068	7-10, Cols. D-E	4

FPSC DOCKET 920260-TL
FPSC STAFF'S 14TH PRODUCTION OF DOCUMENTS

EXPLANATION OF PROPRIETARY DESIGNATION

1. 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.
2. 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.
3. 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.

LOCATION OF THE PROPRIETARY DESIGNATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASONS</u>
F01B14Z00248	11-12, 15, 18	3
00249	22, 25, 26, 30, 33-37	3
00258	3-5	3
00260	4-6, 8-10, 17-18, 20-24	3
00261	1, 3, 5, 21, 27, 28, 29, 32, 36, 37, 39, 40	2

00262	1, 9, 10	3
00267	22-24, 29	3
00270	16	2
00288	14, 15, Cols. E-G	2
00289	6, 9, 10, 12, 16, 19, 21, 23, 25, 28 All C&D; 33	2
00290	7, 9, 11, 12, 14, 16, 24, 26, 27, 28, 29, 31, 32, 33 All B-F; 35C, E; 36A	2
00291	8-10 B&C; 13-27 C	2
00292	26-30 A	2
00293	4	2
00306	23	3
00308	6	2
00313	12	3
00314	8, 9, 24, 29, 30	1
00315	11-12, 15, 18	3
00319	4, 5, 6, 8-10, 17, 18, 20-24, 26, 29, 30, 33, 35	2
00320	1, 3, 5, 21, 27-29, 32, 36, 37, 39, 40	2 3
00321	1, 9, 10	3&2
00322	23, 26, 27, 31, 34-38	3
00341	27, 33	3
00342	4, 17-19, 23, 25	3
00343	5, 11	3
00351	25, 26	3
00361	5, 10	3

FPSC DOCKET 920260-TL
FPSC STAFF'S 14TH PRODUCTION OF DOCUMENTS

EXPLANATION OF PROPRIETARY DESIGNATION

1. 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.
2. 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.
3. 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.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASONS</u>
F01B14Z00411		1
F01B14Z00469	12, 13	1
	00470 2, 21, 22	1
	00472 25, 26, 28, 29	2
	00473 4-7	1
	00482 22, 23	1

00484	13	1
00485	4-6	1
00489	5, 8, 11, 19	2
00490	6, 14, 16, 19	2
00491	6, 9, 11, 15	2
00492	1	2
00493	9-11, 16	2
00496	9, 10	2
00497	3, 15, 17	2
00499	7	2
00506	4-6	1
00507	17, 22, 23	2
00508	4, 7, 8, 11, 13	1
00561	27	1
00725	36-39	1
00726	1-5	1
00729	33-41	1
00765	14, 5, 18, 19, 24, 24, 27 28, 32, 33	3
00766	5, 6, 8, 9, 12, 13	3
00767	7-10	3
00861	30-31	1
00907	11	1
01049	9-11	2
01050	1	2
01053	3, 15-17	2
01054	9, 10	2
01056	6, 11, 15	2
01057	6, 14, 16, 19	2
01058	6, 9, 12, 20	2
01066	7	2
01137	8	2
01138	11	1
01139	11	1