NANCY B. WHITE General Attorney

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February 9, 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.

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

Enclosures

cc: All Parties of Record

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

RECEIVED & FILED



DOCUMENT NUMBER OF DATE

01567 FEB-98

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 February, 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: February 9, 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 portions of the deposition of Anthony Lombardo taken on January 12, 1993.

- 1. Southern Bell is filing its Request for Confidential Classification for portions of the deposition transcript of Anthony Lombardo taken on January 12, 1993, because it deems the information requested as confidential and proprietary business in that it reflects strategic planning information. In that competitors 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 deposition 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 portion of the deposition with the confidential information deleted.
- 4. Attached as Attachment C is a sealed envelope containing copies of the portion of the deposition 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. Pages 116-163 of the deposition of Anthony Lombardo are entitled to proprietary confidential classification. The disclosure of this competitive strategic planning information would impair Southern Bell's ability to compete. 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 the deposition of Anthony Lombardo, 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 February, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

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c/o Marshall M. Criser

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ATTACHMENT "A" Location of Proprietary Material

Lombardo's Deposition Transcript Docket 920260-TL January 12, 1993

The material found in portions of A. M. Lombardo's January 12, 1992 Deposition Transcript is considered by Southern Bell to be proprietary and confidential business information. Disclosure of this material would reveal to competitors, Southern Bell's strategies and business plans used in negotiations with competitors.

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