Legal Department

NANCY B. WHITE General Attorney

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

February 17, 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, 900960-TL, 910163-TL 910727-TL

Dear Mr. Tribble:

Enclosed is an original and fifteen copies of a Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file this document in the above-captioned dockets.

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, am Dehite

Enclosures

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

DOCUMENT NUMBER-DATE 01892 FEB 17 8 FPSC-RECORDS/REPORTING CERTIFICATE OF SERVICE Docket No. 920260-TL Docket No. 900960-TL Docket No. 910163-TL Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 17th day of February, 1993 to:

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

Tracy Hatch Division of Legal Services Florida Public Svc. Commission 101 East Gaines Street Tallahassee, FL 32399-0863

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|) Docket No. 920260-TL))) |
|---|
| _/ Docket No. 900960-TL))) |
| -/ Docket No. 910163-TL)))))) |
|) Docket No. 910727-TL |
|) Filed: February 17, 1993))) |
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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 Code, and files its Request for Confidential Classification regarding certain late-filed exhibits requested by Staff at the deposition of Walter S. Reid taken on January 7, 1993. In support of its Request, Southern Bell shows the following:

1. On January 7, 1993, the Staff of the Florida Public Service Commission conducted a deposition of Walter S. Reid, an employee of Southern Bell. During the course of the deposition, Staff requested that Mr. Reid submit certain late-filed exhibits. 2. On February 5, 1993, Southern Bell submitted some of the late-filed exhibits requested at Mr. Reid's January 7, 1993 deposition. The Company indicated at that time that it would be submitting other exhibits together with a Request for Confidential Classification relating to such exhibits as soon as they were compiled.

3. Southern Bell has now gathered the additional exhibits, those being Exhibits No. 2, 3, 4, and 6, which contain confidential information. Therefore, Southern Bell herewith files its Request for Confidential Classification for the information contained in the documents being delivered to Staff.

4. Southern Bell has appended to this Request for Confidential Classification as Attachment "A" a listing of the location in the documents of the information designated by Southern Bell as confidential, together with statements indicating why the material should be treated as proprietary confidential business information.

5. Appended hereto in an envelope designated as Attachment "B" are two copies of the document with the confidential information deleted.

6. Appended hereto in an envelope designated as Attachment "C" are copies of the documents with the proprietary information highlighted.

7. The information deemed to be confidential by Southern Bell and identified in Attachment "A" contains, among other things, information concerning competitive interests and/or

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unregulated operations, information concerning other companies in Florida and internal company audits. With regard to competitive, unregulated, and other company information, any competitor would benefit from possession of this information. Possession of this information would assist Southern Bell's competitors in establishing strategies. If the information were allowed to be released in the public domain, Southern Bell's revenues could well be diminished, with a resulting shortfall which would work to the obvious detriment of Southern Bell's ratepayers, as well as harm the competitive position of Southern Bell. Therefore, under § 364.183, Florida Statutes, this information is exempt from the Open Records Act. Likewise, the information concerning internal audits is exempt from the Open Records Act under § 364.183, Florida Statutes.

8. In accordance with Rule 25-22.006, Florida Administrative Code, this information for which confidential treatment is sought is intended to be and is treated by the Company as private and has not been disclosed on a nonconfidential basis.

WHEREFORE, Southern Bell Telephone and Telegraph Company moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the attached exhibits, to be confidential, proprietary business information and thus not subject to public disclosure.

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Respectfully submitted this 17th day of February, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY (22

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Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 2 Page 1 of 3

FPSC DOCKET 920260-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

- A. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. In particular, this information discusses aspects of Southern Bell's CCS, CPE, and/or Inside Wire services. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- B. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business, and/or unregulated operations of Southern Bell and/or other companies. In particular, this information discusses aspects of BAPCO's publishing and advertising business. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- C. This information reflects employee personnel information unrelated to compensation, duties, qualifications or responsibilities. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- D. This information reflects Percent Interstate Usage (PIU) of other companies in Florida. The other companies strive to keep this information confidential because it reflects usage in a competitive toll market. The companies would be reluctant to provide this information to Southern Bell if they knew this information would be made available to their competitors. Thus, public disclosure would impair Southern Bell's ability to deal with these other companies and is therefore proprietary under Section 364.183, Florida Statutes.

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Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 2 Page 2 of 3

- E. This information relates to internal Company audits. Southern Bell considers this information proprietary and confidential business information. As such, this information is specifically classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.
- F. This information contains revenue data for other companies which may be considered by the other companies as proprietary and confidential business information. The companies would be reluctant to provide this information to Southern Bell if they knew this information would be made available to their competitors. Thus, public disclosure of this information would impair Southern Bell's ability to deal with these other companies and is therefore proprietary under Section 364.183, Florida Statutes.
- G. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of BellSouth. In particular, this material contains financial information related to the unregulated, competitive subsidaries including BellSouth Mobility, Sunlink, BAPCO, BCI, BIS, and FINS. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF PROPRIETARY INFORMATION

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| <u>F01B0700402</u> 0403 0404 0405 0406 0407 0408 0409 | 3 3-5 3-6, 8, 11, 15 3-5 3-5 3-5 3-5 3-8 3-5 | F F F F F F F F |
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Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 2 Page 3 of 3 0412 3, 4, 7, 9 3, 6, 8, 9, 11 F 0413 F 3, 6, 13 3, 4, 7, 8, 12 3, 4, 6 3, 9 3, 10 0414 F 0415 F 0416 F 0417 F 0418 \mathbf{F} 0419 3-8 F 0583 26-29 Е 0621 1 - 18D 0622 4-23 D 0623 4-9 D 3, 7, 11, 15, 19 17-19, 21, 22 8-40, 43 Cols. B-C 0625 D 0626 D 0863 Α 0865 11, 12, 19, 20 Cols. C-E Α 5-15, 18 0872 Α 11, 13, 16, 17 11, 13, 15, 17, 19, 27, 28 0875 Α 0881 Col. D 16, 21 А 0882 Α 0883 10-14, Cols. B-E Α 8-12, Cols. B-D 8-12, Col. B 24, 26-32, 34 0884 A 0885 Α 0890 G 11, 13, 15, 17, 19 17, 21 0900 Α 0901 А 8-12 0902 А 0913 26-29 Ε

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Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 3

FPSC DOCKET 920260-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business, and/or unregulated operations of Southern Bell and/or other companies. In particular, this information discusses aspects of BAPCO's publishing and advertising business. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF PROPRIETARY INFORMATION

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Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 4

FPSC DOCKET 920260-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business, and/or unregulated operations of Southern Bell and/or other companies. In particular, this information discusses aspects of BAPCO's publishing and advertising business. As such, this information is classified as confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

LOCATION OF PROPRIETARY INFORMATION

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Lines 10-12

Attachment A Walter S. Reid Late Filed Deposition Exhibit No. 6 Page 1 of 1

FPSC DOCKET 920260-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

A. This information reflects Percent Interstate Usage (PIU) of other companies in Florida. The other companies strive to keep this information confidential because it reflects usage in a competitive toll market. The companies would be reluctant to provide this information to Southern Bell if they knew this information would be made available to their competitors. Thus, public disclosure would impair Southern Bell's ability to deal with these other companies and is therefore proprietary under Section 364.183, Florida Statutes.

LOCATION OF PROPRIETARY INFORMATION

Lines 11-29, columns A-D