NANCY B. WHITE General Attorney

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

March 1, 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 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



CERTIFICATE OF SERVICE Docket No. 920260-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 1st day of March, 1993 to:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)				
the Revenue Requirements and Rate)	Docket	No. 92	0260-9	ΓL
Stabilization Plan of Southern)				
Bell Telephone and Telegraph)	Filed:	March	1, 19	993
Company)			•	
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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 Division Code, and files its Request for Confidential Classification for portions of certain Company supplemental responses to Staff's Nineteenth Set of Interrogatories dated December 2, 1992.

- 1. Southern Bell is filing its Request for Confidential Classification for Supplemental Interrogatory Response No. 454, 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 response 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 response
 with the confidential information deleted.
- 4. Attached as Attachment C is a sealed envelope containing a copy of the Interrogatory response 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 NUMBER-DATE

- 5. Regarding Southern Bell's supplemental response to Interrogatory Item No. 457, this response is entitled to proprietary confidential classification because it contains statistical distributions of Southern Bell's intraLATA toll revenues by mileage band and time of day. This information discloses usage patterns and demand levels for certain classes of Southern Bell customers and shows the corresponding 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. information contained in Southern Bell's supplemental response to Item No. 454, 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 1st day of March, 1993.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY 6

c/o Marshall M. Criser

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4300 - 675 West Peachtree St.

Atlanta, Georgia 30375

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ATTACHMENT "A"

INDEX AND JUSTIFICATION FOR CONFIDENTIALITY REQUEST

FOR SUPPLEMENTAL RESPONSE TO

STAFF'S 19TH SET OF INTERROGATORIES, ITEM NO. 454

The information contained in this response contains statistical distributions of Southern Bell's intraLATA toll revenues by mileage band and time of day. This information discloses usage patterns and demand levels for certain classes of Southern Bell customers and shows the corresponding mileage for intraLATA calls made by these customers. Competitors in the intraLATA toll market could use this information to selectively target their marketing strategies and pricing to appeal to key customers, thereby impairing Southern Bell's ability to compete in the intraLATA toll market. As such, this information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.813, Florida Statutues.

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