J. Phillip Carver General Attorney Southern Bell Telephone and Telegraph Company c/o Marshall M. Criser III Suite 400 150 So. Monroe Street Tallahassee, Florida 32301 Phone (305) 530-5558

June 7, 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. 921193-TL - Palm Beach County EAS

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Traffic Study in response to Order No. PSC-93-0029-PCO-TL and Request for Specified Confidential Classification, which we ask that you file in the 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 to the parties shown on the attached Certificate of Service.

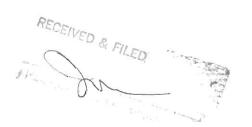
Sincerely yours

. Phillip'Carve

Enclosures

cc: All Parties of Record

A. M. Lombardo Harris R. Anthony R. Douglas Lackey



DOCUMENT NENDER-DATE

06102 JUN-73

CERTIFICATE OF SERVICE Docket No. 921193-TL

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 7th day of 1993 to:

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

Alan N. Berg Senior Attorney United Telephone Co. of Florida Post Office Box 5000 Altamonte Spgs, FL 32715-5000

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

J. Phillip Carra

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request by Palm Beach) Docket No. 921193-TL County Board of County) Commissioners for Extended Area) Filed: June 7, 1993 Service Between all Exchanges) in Palm Beach County)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S REQUEST FOR SPECIFIED 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 Specified Confidential
Classification for certain information included in Southern
Bell's Traffic Studies filed in the above-referenced docket.

1. On January 6, 1993, the Florida Public Service

Commission ("Commission") issued Order No. PSC-93-0029-PCO-TL,

which required Southern Bell to file traffic studies. By Order

No. PSC-93-0764-PCO-TL, issued May 20, 1993, the time for filing

these studies was extended until June 5, 1993. In response to

the Commission's Order, Southern Bell is filing traffic studies

on routes that contain traffic information which is proprietary

DOCUMENT NUMBER-DATE

06102 JUN-78

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¹ Since June 5, 1993 fell on a Saturday, the due date is the next business day thereafter, June 7, 1993. <u>See</u>, Rule 1.090, Florida Rules of Civil Procedure.

confidential business information. This information is comprised of Southern Bell's intraLATA traffic data regarding routes in Palm Beach County. With the advent of intraLATA competition on January 1, 1992, these routes are subject to toll competition and are thus qualified for confidential treatment.

- 2. In accord with Rule 25-22.006, Florida Administrative Code, the information that Southern Bell considers proprietary has been highlighted for identification purposes and appended hereto as Exhibit "A". Southern Bell has also appended hereto as Exhibit "B" two edited copies of the traffic studies with this confidential information removed. Finally, Southern Bell has appended as Exhibit "C" a listing of the page and line at which this confidential information appears.
- 3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is entitled to confidential treatment by demonstrating how the information qualifies under one of the statutory examples designated therein. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement to indicate how Southern Bell or its ratepayers or its business operations will be harmed by public disclosure.
- 4. The traffic data for the routes at issue in this proceeding essentially provide a blueprint of the toll usage over

these various routes. This information is maintained by Southern Bell on a proprietary and confidential basis in order that Southern Bell may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

- 5. Although the traffic information is clearly necessary for a full examination of the merits of the extended area service request in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. With the advent of intraLATA toll competition effective January 1, 1992, this information could now subject Southern Bell to competitive harm if it were made public. The disclosure of such traffic patterns to the public would make available to Southern Bell's competitors highly valuable competitive information that such competitors could use to target the most lucrative routes.
- 6. The information for which confidential treatment is requested is intended to be and is treated as confidential by Southern Bell and has not been disclosed to the public.

WHEREFORE, Southern Bell respectfully requests that the Commission enter an order classifying the above-described traffic data as proprietary confidential business information pursuant to

Rule 25-22.006, Florida Administrative Code, that is exempt from public disclosure pursuant to Section 119.07, Florida Statutes.

Respectfully submitted,

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

HARRIS R. ANTHONY

General Counsel-Florida

c/o Marshall M. Criser III

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General Attorney

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Tallahassee, FL 32301

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EXHIBIT C PAGE 1 of 5

FPSC DOCKET 921193-TL SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

The following information is identified by page and line numbers is considered confidential and proprietary:

ATTACHHENT	PAGE NO.	LINE NOS.	REASON PROPRIETARY
A	1 2	1-23 24-32	1
A-1	1 2	1-21 22-32	1 1
A-2	1	1-16	1
B	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	1-28 1-28 1-28 1-28 1-28 1-28 1-28 1-28	1 1 1 1 1 1 1 1 1 1 1 1 1

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EXHIBIT C PAGE 2 OF 5

ATTACHMENT	PAGE NO.	LINE NOS.	REASON PROPRIETARY
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EXHIBIT C PAGE 3 OF 5

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ATTACHMENT	NO.	LINE NOS.	REASON PROPRIETARY
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EXHIBIT C PAGE 4 OF 4

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EXHIBIT C PAGE 5 OF 5

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	2	25-32	1
H	1	1,-3	1

These traffic data relate to toll usage over the various routes at issue. This is proprietary information maintained by Southern Bell on a confidential basis to plan its network deployment based on traffic demand over the respective toll routes. The disclosure of this information would allow Southern Bell's competitors in the intraLATA toll market to target the most lucrative routes and would thereby competitively harm Southern Bell.

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