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August 24, 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. 921074-TP - Intermedia's Petition

Dear Mr. Tribble:

Enclosed please find an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for 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,

J. Phillip Carver
J. Phillip Carver

Enclosures

cc: All Parties of Record
A. M. Lombardo
Harris R. Anthony
R. Douglas Lackey

RECEIVED & FILED

J. J.
FPSC DIVISION OF RECORDS

A BELLSOUTH Company

DOCUMENT NUMBER-DATE

09147 AUG 24 93

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 921074-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *24th* day of *August* 1993,
to:

Tracy Hatch
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J. Phillip Carver (07)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: In the Matter of the) Docket No. 921074-TP
Petition of Intermedia Communica-)
tions of Florida, Inc. for)
Expanded Interconnection for AAVs)
within LEC Central Offices.)
_____) Filed: August 24, 1993

**SOUTHERN BELL'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION**

COMES NOW BellSouth Telecommunications, Inc. d/b/a/ Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), and hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request for Confidential Classification and states as grounds in support thereof the following:

1. On June 29, 1993, the Florida Public Service Commission Staff ("Staff"), propounded upon Southern Bell by mail its First Set of Interrogatories, which contain Interrogatory Nos. 1 through 45. Responses to these interrogatories were, therefore, due on or before August 3, 1993. Southern Bell filed its response on that date. At the same time, Southern Bell filed a Notice of Intent to seek confidential treatment for certain proprietary information that was provided in response to Interrogatory No. 42.

2. The response to Interrogatory No. 42 includes proprietary information that relates to the competitive interests of Southern Bell. If this information were publicly disclosed, then this disclosure could result in damage to Southern Bell's business. Thus, this information is entitled to confidential

classification pursuant to the terms of §364.183, Florida Statutes.

3. Southern Bell has filed as Attachment "A" a listing of the specific lines on the single page of the response to Interrogatory No. 42 that contain proprietary confidential information, all of which are confidential for the reasons set forth below. Southern Bell has also filed a highlighted version of the response in a sealed container, which is marked as Attachment "B". Finally, Southern Bell has filed two redacted copies of the response as Attachment "C".

4. Section 364.183(3)(e) provides specifically that information shall be treated as confidential that relates to the Company's "competitive interests", when "the disclosure of ... [this information] ... would impair the competitive business of the provider of information".

5. Interrogatory No. 42 inquires specifically as to whether large users of Southern Bell's private line and special access services typically enter into contracts of more than two years duration. It also inquires as to the average length of these contracts. In order to answer this question, Southern Bell necessarily had to identify the services that are used by large users as well as the types of contracts that are utilized most frequently with each service and the duration of these contracts. This is clearly proprietary information, the disclosure of which could potentially harm Southern Bell's competitive interests.

6. Specifically, if a competitor of Southern Bell knows which of the identified services are used most and the duration of the contracts for this use, then this knowledge would allow the competitor (or potential competitor) to offer competing products at a time and in a manner that could result in a loss of customers to Southern Bell. In other words, if a competitor knows the duration of contracts for a particular service, then it can time its offerings of competing services to take advantage of this information. This is precisely the type of information that is entitled to confidential classification under the express terms of Section 364.183(3)(e), Florida Statutes.

WHEREFORE, Southern Bell requests that this Commission grant its Request for Confidential Classification as to the above-referenced information.

Respectfully submitted this 24th day of August, 1993.

ATTORNEYS FOR SOUTHERN BELL
TELEPHONE AND TELEGRAPH COMPANY

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FPSC DOCKET 921074-TP
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY
REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXPLANATION FOR PROPRIETARY INFORMATION

1. The portions of Southern Bell's response to interrogatory No. 42 designated below include confidential, proprietary information that relates to the competitive interests of Southern Bell. This information is entitled to confidential classification under express provisions of Section 364.183(3) (e), Florida Statutes.

LOCATION OF PROPRIETARY INFORMATION

INTERROGATORY 42

<u>PAGE</u>	<u>LINE NO./COLUMN</u>	<u>REASON</u>
1	lines 3-8 (contracts.. ..24-26 months)	1
1	lines 11-12 (The majority.. ..Plan A rates)	1
1	lines 18-20 (Of the two.. ..Plan B rates)	1

M E M O R A N D U M

August 25, 1993

TO: _____ **DIVISION OF APPEALS**
_____ **DIVISION OF AUDITING AND FINANCIAL ANALYSIS**
 _____ **DIVISION OF COMMUNICATIONS**
_____ **DIVISION OF ELECTRIC AND GAS**
_____ **DIVISION OF RESEARCH**
_____ **DIVISION OF WATER AND SEWER**
_____ **DIVISION OF LEGAL SERVICES**

FROM: **DIVISION OF RECORDS AND REPORTING (FLYNN)**

RE: **CONFIDENTIALITY OF CERTAIN INFORMATION**

DOCUMENT NO.: 09148-93

DESCRIPTION: Response to Staff's Interrogatory No. 42

SOURCE: Southern Bell Telephone

DOCKET NO.: 921074-TP

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

_____ The document(s) is (are), in fact, what the utility asserts it (them) to be.