

## YOUNG, VAN ASSENDERP, VARNADOE &amp; BENTON, P. A.

ATTORNEYS AT LAW

REPLY TO:

ORIGINAL  
FILE COPY

Tallahassee

September 24, 1993

R. BRUCE ANDERSON  
RICHARD E. BENTON  
TASHA O. BUFORD  
DAVID L. COOK\*  
DAVID B. ERWIN  
C. LAURENCE KEESEY  
MARY A. MARNELL  
ANDREW I. SOLIS  
G. DONALD THOMSON  
KENZA VAN ASSENDERP  
GEORGE L. VARNADOE  
ROY C. YOUNG

\*BOARD CERTIFIED REAL ESTATE LAWYER

GALLIE'S MALL  
225 SOUTH ADAMS STREET, SUITE 200  
POST OFFICE BOX 1833  
TALLAHASSEE, FLORIDA 32302-1833  
TELEPHONE (904) 222-7206  
TELECOPIER (904) 561-6634

SUN BANK BUILDING  
801 LAUREL OAK DRIVE  
SUITE 300  
POST OFFICE BOX 7907  
NAPLES, FLORIDA 33941-7907  
TELEPHONE (813) 597-2814  
TELECOPIER (813) 597-1060

Mr. Steve Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0850

Subject: Docket No. 921074-TP  
Petition of INTERMEDIA COMMUNICATIONS OF FLORIDA,  
INC., for Expanded Interconnection for AAVs Within  
LEC Central Offices

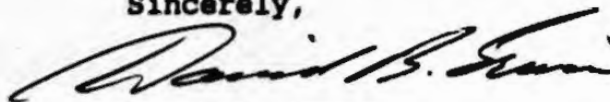
Dear Mr. Tribble:

On September 9, 1993, I requested confidential classification for the Northeast Florida Telephone Company response to Interrogatory No. 6.

I have been advised that my request was deficient on its face by virtue of not having provided a line-by-line justification for why confidentiality should be provided.

Enclosed are 15 copies of a line-by-line justification, with copies of the redacted Interrogatory No. 6 attached. The highlighted copy has been provided to you under separate cover.

Sincerely,



David B. Erwin

DBE:akh  
Enclosure  
cc: John Carroll  
Charles Murphy  
Parties of Record

DOCUMENT NUMBER-DATE

10317 SEP 24 83

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Private Line       )  
and Special Access        )  
Expanded Interconnection )

Docket No. 921074-TP

**NORTHEAST FLORIDA TELEPHONE COMPANY**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**CONFIDENTIAL DOCUMENTS**

**Line-by-Line Justification**

a) Line 1

This line gives the monthly private line and special access revenue for Northeast Florida Telephone Company's (Northeast) largest private line and special access customer. This revenue information is valuable market information related to private line and special access business, which would be subject to diversion in the event that the Commission should allow expanded interconnection, as requested by parties to Docket No. 921074-TP. If the monthly revenue for Northeast's largest private line and special access customer is disclosed to the public, it would give Northeast's competitors free access to a key market factor. It would tell a competitor the maximum amount of revenue obtainable from private line customers of Northeast, and it would allow a competitor to tailor competitive services for that size customer. Instead, Northeast's competitors should be required to prepare market studies at their own expense. The competitors should be required to use their own market studies to devise products and service offerings.

Customer revenue information is proprietary confidential business information within the meaning of the term as defined in §364.183(a), F.S.

b) Line 2

The information given on Line 2 is the exact percentage of use of special access and private line service of Northeast's largest customer of private line and special access service. This information is a "trade secret" as that term is defined in §688.002(4), F.S., the Uniform Trade Secrets Act. As such, it is "proprietary confidential business information," as described by §364.183(3)(a), F.S. It would be detrimental to Northeast to be required to disclose to the public the information given in response to Interrogatory No. 6.

c) Line 3

The information given at this point is the monthly revenue for the next to largest Northeast customer of private line and special access service. The arguments given in paragraph (a), above, are equally applicable here.

d) Line 4

The information given here is the exact percentage of use for the next to the largest special access and private line customer. The arguments given in paragraph (b), above, are equally applicable here.

STAFF'S FIRST SET OF INTERROGATORIES TO  
NORTHEAST, QUINCY AND SOUTHLAND  
DOCKET NO. 921074-TP  
PAGE 1

- 6. List of your "large users" of private line and special access service. ("Large users" are defined as businesses that account for greater than 15% of the total revenue of the Company's private line and special access services.)
  - a. Provide the percentage of the private line and special access revenue for each "large user."

Luna

RESPONSE: Customer A - [redacted] monthly private line and special access revenues, [redacted] of total private line and special access revenues. Customer B - [redacted] monthly private line and special access revenues, [redacted] of total private line and special access revenues.

1  
2  
3  
4  
5

- 37. Do you currently have interconnection arrangements to any other provider of telecommunication service? If yes, to whom are they offered and how are they provisioned?

RESPONSE: No interconnection in our central offices. We interconnect at the Southern Bell tandem in Jacksonville.

- 38. What are the rates, terms and conditions which apply to those service providers who currently interconnect with your network?

RESPONSE: Not applicable.

- 40. What parts of the FCC's order on expanded interconnection do you disagree with and why? What alternatives do you believe are appropriate and why?

RESPONSE: We agree with that part of the FCC order that mandates the order only on Tier 1 companies.



## M E M O R A N D U M

September 27, 1993

TO: \_\_\_\_\_ DIVISION OF APPEALS  
\_\_\_\_\_ DIVISION OF AUDITING AND FINANCIAL ANALYSIS  
X \_\_\_\_\_ 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.: 10318-93

DESCRIPTION: Response to Interrogatory No. 6 of Staff's  
1st Set. Original Document No. 09749-93.

SOURCE: Northeast Florida Telephone Company

DOCKET NO.: 921074-EP

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.

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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.