NANCY B. WHITE General Attorney

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

August 15, 1995

Mrs. Blanca S. Bayo Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

RE: Docket No. TL

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Request for Confidential Classification. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Enclosures

cc: All Parties of Record

A. M. Lombardo

R. G. Beatty

R. D. Lackey

RECEIVED & FILED

FPSO-BUREAU OF RECORDS

DOCUMENT SUMMER TO BATE

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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 15th day of August, 1995 to:

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Florida Public Service
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Tallahassee, FL 32399-0850

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Manay B. White (2)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of the Revenue Requirements and Rate Stabilization Plan of Southern Bell Telephone and Telegraph Company

Docket No. 920260-TL

Filed: August 15, 1995

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"), and pursuant to Rule 25.22.006, Florida Administrative Code, files its Request for Confidential Classification for certain information provided in Late Filed Hearing Exhibit No. 15.

- 1. Southern Bell is filing its Request for Confidential Classification for portions of documents produced in response to a Late Filed Hearing Exhibit request which contains toll usage and revenue for various routes at issue in this docket.
- 2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the documents of the information designated by Southern Bell as confidential as well as the required correlation with the specific justification for confidential classification.
- 3. Appended hereto in a package designed as Attachment B are two edited copies of the documents with the confidential information deleted.
- 4. Attached as Attachment C is a sealed package containing copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

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FPSC-RECORDS/REPORTING

- 5. With respect to the documents produced in Late Filed Hearing Exhibit 15 containing specific toll usage and revenue, this information is entitled to proprietary confidential classification. The data provides a blueprint of Southern Bell's route-specific intraLATA toll usage by exchange for certain LATAs in Florida. This information is 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 impair Southern Bell's ability to compete in the intraLATA toll market. Competitors could use the information to target the most lucrative routes. 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 The information contained in Southern's Late Filed Hearing Exhibit No. 15, as more specifically described above, meets the statutory criteria, and should therefore be 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 generally been publicly 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 15th day of August, 1995.

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY

ROBERT G. BEATTY c/o Nancy Sims

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ATTACHMENT "A"

SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY
FPSC DOCKET NO. 920260-TL
HEARING LATE FILED EXHIBIT
WITNESS: STANLEY
EXHIBIT 15
'95 RATE REDUCTIONS
JULY 31, 1995

EXPLANATION FOR PROPRIETARY INFORMATION

This CIF (Community of Interest Factors) data relates to toll usage and revenue 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.

LOCATION OF THE PROPRIETARY INFORMATION

EXHIBIT 15

PAGE

Line Nos./Col. Nos.

1

All numbers under column labeled CIF