

970226



**GTE Telephone Operations**

One Tampa City Center  
201 North Franklin Street, FLTC0007  
Post Office Box 110  
Tampa, Florida 33601  
813-483-2806  
813-204-8870 (Facsimile)

**Marcell Morrell\*\***  
Vice President & General Counsel - Florida

Associate General Counsel  
**Anthony P. Gillman\*\***  
**Leslie Reicin Stein\***

Attorneys\*  
**Kimberly Caswell**  
**M. Eric Edgington**  
**Ernesto Mayor, Jr.**

\* Licensed in Florida  
\*\* Certified in Florida as Authorized House Counsel

**Ms. Blanca Bayo, Director**  
Division of Records & Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

March 3, 1997


Re: Docket No.  
GTE Florida Incorporated's Request for Confidential Classification of  
Quarterly Report Schedules 8 and 20

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification in the above-referenced matter. The confidential documents have been highlighted and placed in a separate envelope marked "Confidential" for your convenience.

Service has been made as indicated on the Certificate of Service. If you have any questions, please contact me at (813) 483-2617.

Very truly yours,

  
Kimberly Caswell

KC:tas  
Enclosures

c: Sally A. Simmons, Bureau Chief  
End User/Carrier Services & Market Assessment (w/e)

A part of GTE Corporation

DOCUMENT NUMBER-DATE

02256 MAR-3 97

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

GTE Florida Incorporated's Request )  
for Confidential Classification of )  
Quarterly Report Schedules 8 and 20 )

---

Docket No.  
Filed: March 3, 1997

**GTE FLORIDA INCORPORATED'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTEFL) seeks confidential classification and a protective order for Schedules 8 and 20 of its Quarterly Report. This information is required to be filed in accordance with Commission Rule 25-4.0185. While a ruling on this Request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

Highlighted, unredacted copies of the confidential material are attached to only the original of this Request as Exhibit A. Redacted copies of these items are attached to this Request as Exhibit B.

All of the information for which GTEFL seeks confidential treatment falls within Florida Statutes section 364.183(3)(e), which defines the term, "proprietary confidential business information," to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

The confidential information covered in this filing is GTEFL's access lines counts by exchange area and class and grade of service. (Both schedule 8 and schedule 20 show access line data, but they are arranged somewhat differently.) These data will be very valuable in the competitive local exchange market sanctioned by the 1995 revisions

DOCUMENT NUMBER-DATE

02256 MAR-3 1997

FPSC-RECORDS/REPORTING

to Chapter 364. With this information, alternative local exchange carriers (ALECs)—a number of which have already been certified—can discern the number of GTEFL's access lines by location and type of service. They will know the level of GTEFL's presence in the specified locations or exchanges and lines of business. Moreover, because this information is provided quarterly, its ongoing public disclosure would allow GTEFL's competitors to determine growth and market trends in GTEFL's specific exchange areas and types of services. With this knowledge, competitors can tailor their marketing, entry and expansion plans accordingly, avoiding much of the trial and error that is the hallmark of an openly competitive marketplace.

The information for which GTEFL seeks protection is analogous to interexchange carriers' (IXCs') market share and traffic data, which reveals where a carrier's customers are located and their distribution across lines of business. The Commission customarily grants protection for the IXCs' data because of the competitive nature of the marketplace. The introduction of full local competition compels the same kind of protection for the LECs' access line data.

In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. GTEFL emphasizes that while it has amply supported this request with explanations of the most likely uses to which competitors may put GTEFL's data, it is impossible for GTEFL to know precisely how a particular competitor can use this information. GTEFL's competitors are, of course, most familiar with their own operations, objectives, and marketing plans, and only they can know how best to use these data to

their advantage. GTEFL's inability to anticipate fully how competitors might use its confidential information only exacerbates the problems inherent in forcing GTEFL to disclose it publicly. The resulting, unfair advantage afforded GTEFL's competitors will skew the operation of the market, to the ultimate detriment of the telecommunications consumer. It is critical to prevent these regulation-induced distortions now before any further market entry occurs. As noted, numerous ALECs have been certificated in Florida; GTEFL knows that Intermedia Communications Inc. is already operating as both a facilities- and non-facilities-based carrier in GTEFL's service area. The local service promotions of other well-recognized and well-financed carriers--among them AT&T and MCI--are also underway. ALEC activity will rapidly grow more intense as more and more carriers complete interconnection and resale contracts with GTEFL pursuant to the Telecommunications Act of 1996. To this end, GTEFL's arbitration proceedings with AT&T, MCI, and Sprint have finished, and contracts with AT&T and MCI have been submitted for Commission approval.

If the Commission orders public disclosure of GTEFL's competitively sensitive information in this environment, GTEFL will certainly be harmed, as will the market, which cannot operate efficiently if regulators introduce non-market handicaps for some competitors. The Commission can never correct for the market share and other losses to GTEFL. This effect is particularly troublesome and unfair because ICI, AT&T, MCI, Sprint, and GTEFL's other ALEC competitors are under no obligation to make their competitively sensitive market information known to GTEFL.

The above-described rationale for confidential protection applies to the following, specific lines in Schedules 8 and 20. (GTEFL notes that it has not sought confidential protection for the high-level aggregate numbers in the totals columns on Schedule 8 or the total access line number on Schedule 20.)

Schedule 8

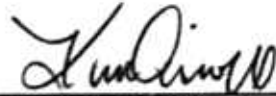
Columns B-I, Lines 1-24: Access line data for each GTEFL exchange, broken down by class of service.

Schedule 20

Page 1, Columns F, H and I, Lines 1-31; Page 2, Columns F, H and I, Lines 32-62; and Page 3, Columns F, H and I, Lines 63-91, with the exception of the total figure in Column H, Line 91: Access line numbers by exchange and breakdown of lines per exchange as percentage of total lines.

For the reasons set forth in this filing, GTEFL asks the Commission to grant this request for confidential classification of the specified information and to issue a permanent protective order with regard to these data. GTEFL further requests return of these data when they are no longer useful to the Staff, or when they are superseded by the next Quarterly Report GTEFL files with the Commission, whichever comes first.

Respectfully submitted on March 3, 1997.



---

Kimberly Caswell  
Anthony P. Gillman  
P. O. Box 110, FLTC0007  
Tampa, FL 33601  
(813) 483-2617

Attorneys for GTE Florida Incorporated

GTE FLORIDA  
ACCESS LINE DATA  
(INCLUDING COMPANY OFFICIAL)

EXHIBIT B  
1 OF 4

SCHEDULE B

PERIOD ENDING: DECEMBER 31, 1996

*A*      *B*      *C*      *D*      *E*      *F*      *G*      *H*      *I*

EXCHANGE	PBX TRUNKS	BUSINESS LOCAL ACCESS LINES	RESIDENCE LOCAL ACCESS LINES	LEC COIN ACCESS LINES	LEC COINLESS ACCESS LINES	CPE COINEXCHANGE ACCESS LINES	INTER ACCESS LINES	TOTALS
1 TAMPA								
2 ST PETERSBURG								
3 CLEARWATER								
4 TARPON SPRINGS								
5 NEW PORT RICHE								
6 HUDSON								
7 LAKELAND								
8 ZEPHYRHILLS								
9 PLANT CITY								
10 MULBERRY								
11 BARTOW								
12 WINTER HAVEN								
13 POLK CITY								
14 FROSTPROOF								
15 INDIAN LAKES								
16 LAKE WALES								
17 HAINES CITY								
18 SARASOTA								
19 VENICE								
20 N P CHARLOTTE								
21 ENGLEWOOD								
22 BRADENTON								
23 MYAKKA								
24 PALMETTO								
25 TOTAL FLORIDA	36,047	548,019	1,519,556	11,810	842	8,561	1,720	2,126,555

REDACTED



# REDACTED

GENERAL TELEPHONE COMPANY OF FLORIDA

TAMPA EAEA

SCHEDULE 20

PERIOD ENDING: DECEMBER 31, 1990

	CO.	LATA	EAEA	EXCHANGE	END OFFICE	EQUAL ACCESS DATA				CENTRAL OFFICE EQUIPMENT DATA				
						ACCESS LINES	E.A. AVAIL. DATE & STATUS	LINES (CUMUL)	% OF TOTAL	PRESENT EQUIP.	PROP. EQUIP.	SERVICE DATE	HOST OR REMOTE	HOST OR REMOTE NAME
1	GTF	TPA	TPA	TAMPA (CENTRAL)	ALAFIA		Nov-87 A			GTDSEAX				
2	GTF	TPA	TPA	BARTOW	ALTURAS		May-89 A			AE-RSU		R		BARTOW MAIN
3	GTF	TPA	TPA	BRADENTON	ANNA MARIA		Aug-89 A			GTDSEAX				
4	GTF	TPA	TPA	WINTER HAVEN	AUBURNDALE		Jun-87 A			GTDSEAX		H		
5	GTF	TPA	TPA	LAKE WALES	BABSON PARK		Jul-89 A			AE-RSU		R		LAKE WALES MAIN
6	GTF	TPA	TPA	BARTOW	BARTOW MAIN		Apr-86 A			GTDSEAX		H		
7	GTF	TPA	TPA	ST. PETERSBURG	BAYOU		Apr-87 A			GTDSEAX				
8	GTF	TPA	TPA	TAMPA (CENTRAL)	BAYSHORE		Jun-86 A			AE-RSU		R		TAMPA MAIN
9	GTF	TPA	TPA	TAMPA (CENTRAL)	BEACH PARK		Feb-88 A			SESS				
10	GTF	TPA	TPA	BRADENTON	BRADENTON BAY		Feb-86 A			GTDSEAX				
11	GTF	TPA	TPA	BRADENTON	BRADENTON MAIN		Nov-86 A			GTDSEAX				
12	GTF	TPA	TPA	MULBERRY	BRADLEY		Jun-89 A			AE-RSU		R		BARTOW MAIN
13	GTF	TPA	TPA	TAMPA (EAST)	BRANDON		Dec-86 A			SESS				
14	GTF	TPA	TPA	TAMPA (CENTRAL)	CARROLLWOOD		Oct-86 A			GTDSEAX				
15	GTF	TPA	TPA	CLEARWATER	CLEARWATER		Oct-86 A			GTDSEAX				
16	GTF	TPA	TPA	CLEARWATER	CLEARWATER MN		Oct-86 A			SESS				
17	GTF	TPA	TPA	CLEARWATER	COUNTRYSIDE		Oct-88 A			GTDSEAX				
18	GTF	TPA	TPA	WINTER HAVEN	CYPRESS GARDENS		Mar-86 A			GTDSEAX				
19	GTF	TPA	TPA	HAINES CITY	DUNDEE		Sep-89 A			GTDSEAX				
20	GTF	TPA	TPA	CLEARWATER	DUNEDIN		Sep-86 A			GTDSEAX				
21	GTF	TPA	TPA	ENGLEWOOD	ENGLEWOOD		Dec-88 A			GTDSEAX				
22	GTF	TPA	TPA	ST. PETERSBURG	FEATHER SOUND		Sep-88 A			GTDSEAX				
23	GTF	TPA	TPA	FROSTPROOF	FROSTPROOF		Aug-89 A			GTDSEAX				
24	GTF	TPA	TPA	ST. PETERSBURG	GANDY		Feb-86 A			GTDSEAX				
25	GTF	TPA	TPA	HAINES CITY	HAINES CITY MAIN		Feb-86 A			GTDSEAX		H		
26	GTF	TPA	TPA	HAINES CITY	HAINES CITY NORTH		Jun-86 A			AE-RSU		R		HAINES CITY MAIN
27	GTF	TPA	TPA	LAKELAND	HIGHLANDS		May-86 A			GTDSEAX				
28	GTF	TPA	TPA	HUDSON	HUDSON		Feb-86 A			GTDSEAX				
29	GTF	TPA	TPA	TAMPA (CENTRAL)	HYDE PARK		Feb-86 A			DMS100				
30	GTF	TPA	TPA	INDIAN LAKE	INDIAN LAKE MAIN		Jun-89 A			AE-RSU		R		LAKE WALES MAIN
31	GTF	TPA	TPA	CLEARWATER	INDIAN ROCKS		Dec-89 A			GTDSEAX				

EXHIBIT B  
2 OF 4



REDACTED

GENERAL TELEPHONE COMPANY OF FLORIDA

TAMPA EAEA  
A B C D E F G H I J K L M N

SCHEDULE 20

PERIOD ENDING: DECEMBER 31, 1996

EXHIBIT B  
3 OF 4

CO	LATA	EAEA	EXCHANGE	END OFFICE	EQUAL ACCESS DATA			CENTRAL OFFICE EQUIPMENT DATA							
					ACCESS LINES	E.A. AVAIL DATE/STATUS	LINES (CUMUL)	% OF TOTAL	PRESENT EQUIP.	PROP. EQUIP.	SERVICE DATE	HOST OR REMOTE	HOST OR REMOTE NAME		
32	GTF	TPA	TAMPA (WEST)	KEYSTONE		Dec-89	A			GTDSEAX					
33	GTF	TPA	WINTER HAVEN	LAKE ALFRED		Aug-89	A			GTDSEAX					
34	GTF	TPA	LAKE WALES	LAKE WALES EAST		Aug-89	A			AE-RSU		R		LAKE WALES MAIN	
35	GTF	TPA	LAKE WALES	LAKE WALES MAIN		Dec-88	A			GTDSEAX					
36	GTF	TPA	LAKELAND	LAKELAND EAST		Sep-86	A			SESS					
37	GTF	TPA	LAKELAND	LAKELAND MAIN		Mar-88	A			GTDSEAX					
38	GTF	TPA	LAKELAND	LAKELAND NORTH		Jun-88	A			GTDSEAX					
39	GTF	TPA	TAMPA (NORTH)	LAND O' LAKES		Dec-86	A			SESS					
40	GTF	TPA	CLEARWATER	LARGO		Jan-87	A			SESS					
41	GTF	TPA	ST. PETERSBURG	LEALMAN		Dec-86	A			SESS					
42	GTF	TPA	SARASOTA	LONGBOAT		May-89	A			GTDSEAX					
43	GTF	TPA	TAMPA (NORTH)	LUTZ		Sep-89	A			GTDSEAX					
44	GTF	TPA	HUDSON	MOON LAKE		Jan-86	A			GTDSEAX					
45	GTF	TPA	MULBERRY	MULBERRY		Dec-87	A			AE-RSU		R		BARTOW MAIN	
46	GTF	TPA	MYAKKA	MYAKKA MAIN		Apr-89	A			GTDSEAX		R		SARASOTA MAIN	
47	GTF	TPA	NEW PORT RICHEY	N PORT RICHEY		Oct-86	A			GTDSEAX					
48	GTF	TPA	ST. PETERSBURG	NORTH GULF BEACH		May-86	A			GTDSEAX					
49	GTF	TPA	NORTH PORT	NORTH PORT CH		Oct-89	A			GTDSEAX					
50	GTF	TPA	TAMPA (WEST)	OLDSMAR		Jun-88	A			GTDSEAX					
51	GTF	TPA	VERICE	OSPREY		Jul-89	A			GTDSEAX					
52	GTF	TPA	BRADENTON	PALMA SOLA		Feb-86	A			GTDSEAX					
53	GTF	TPA	PALMETTO	PALMETTO		Mar-88	A			GTDSEAX		H			
54	GTF	TPA	PALMETTO	PARRISH		Nov-89	A			AE-RSU		R		PALMETTO	
55	GTF	TPA	ST. PETERSBURG	PASADENA		Feb-86	A			GTDSEAX					
56	GTF	TPA	PLANT CITY	PINECREST		Oct-89	A			GTDSEAX					
57	GTF	TPA	CLEARWATER	PINELLAS		May-86	A			GTDSEAX					
58	GTF	TPA	PLANT CITY	PLANT CITY MAEN		Jan-87	A			DMS100					
59	GTF	TPA	POINCIANA	POINCIANA		Mar-86	A			AE-RSU		R		HAINES CITY MAIN	
60	GTF	TPA	POLK CITY	POLK CITY		Nov-87	A			AE-RSU		R		AUBURNDALE	
61	GTF	TPA	TAMPA (SOUTH)	RUSKIN		Jul-87	A			GTDSEAX					
62	GTF	TPA	SARASOTA	SARASOTA MIN		Jan-86	A			GTDSEAX					

REDACTED

GENERAL TELEPHONE COMPANY OF FLORIDA

TAMPA EALA

SCHEDULE 20

PERIOD ENDING: DECEMBER 31, 1990

A B C D E F G H I J K L M N

CO.	LATA	EAEA	EXCHANGE	END OFFICE	ACCESS LINES	EQUAL ACCESS DATA			% OF TOTAL	PRESENT EQUIP.	CENTRAL OFFICE EQUIPMENT DATA		
						E.A. AVAIL. DATE & STATUS	LINES (CUMUL)				PROP. EQUIP.	SERVICE DATE	HOST OR REMOTE
63	GTF	TPA	SARASOTA	NORTHSIDE		Jul-87	A		GTDSEAX				
64	GTF	TPA	SARASOTA	SOUTHSIDE		May-86	A		GTDSEAX				
65	GTF	TPA	SARASOTA	SARASOTA SPRINGS		Feb-86	A		GTDSEAX				
66	GTF	TPA	TAMPA (CENTRAL)	SEMINOLE		Oct-86	A		SESS				
67	GTF	TPA	NEW PORT RICHEY	SEVEN SPRINGS		Feb-86	A		GTDSEAX				
68	GTF	TPA	SARASOTA	SIESTA KEY		Aug-88	A		GTDSEAX				
69	GTF	TPA	ST. PETERSBURG	SKYWAY		Jan-87	A		SESS				
70	GTF	TPA	ST. PETERSBURG	SOUTH GULF BEACH		Sep-87	A		GTDSEAX				
71	GTF	TPA	SARASOTA	ST. ARMANDS KEY		Aug-88	A		AE-RSU		R	SARASOTA MAIN	
72	GTF	TPA	CLEARWATER	ST. GEORGE		Feb-86	A		GTDSEAX				
73	GTF	TPA	ST. PETERSBURG	ST. PETE MN		Mar-86	A		GTDSEAX				
74	GTF	TPA	ST. PETERSBURG	ST. PETE SOUTH		Aug-86	A		GTDSEAX				
75	GTF	TPA	TAMPA (CENTRAL)	SULPHUR SPRINGS		Jan-87	A		GTDSEAX				
76	GTF	TPA	TAMPA (CENTRAL)	SWEETWATER		Aug-86	A		GTDSEAX				
77	GTF	TPA	TAMPA (CENTRAL)	TAMPA EAST		Mar-86	A		SESS				
78	GTF	TPA	TAMPA (CENTRAL)	TAMPA MAIN		Apr-86	A		GTDSEAX		H		
79	GTF	TPA	TAMPA (CENTRAL)	WESTSIDE		Nov-86	A		GTDSEAX				
80	GTF	TPA	TARPON SPRINGS	TARPON SPRINGS		Jul-87	A		GTDSEAX				
81	GTF	TPA	TAMPA (CENTRAL)	TEMPLE TERRACE		Dec-86	A		SESS				
82	GTF	TPA	TAMPA (EAST)	THONOTOSASSA		Nov-86	A		SESS				
83	GTF	TPA	TAMPA (CENTRAL)	UNIVERSITY		Jan-87	A		SESS				
84	GTF	TPA	VENICE	VENICE MAIN		Mar-86	A		GTDSEAX				
85	GTF	TPA	VENICE	VENICE SOUTH		Dec-86	A		SESS				
86	GTF	TPA	TAMPA (CENTRAL)	WALLCRAFT		Feb-86	A		SESS				
87	GTF	TPA	TAMPA (NORTH)	WESLEY CHAPEL		Dec-86	A		GTDSEAX				
88	GTF	TPA	TAMPA (SOUTH)	WIMAUMA		Nov-88	A		GTDSEAX				
89	GTF	TPA	WINTER HAVEN	WINTER HAVEN MAIN		Jan-87	A		DMS100				
90	GTF	TPA	TAMPA (CENTRAL)	YBOR		Nov-86	A		SESS				
91	GTF	TPA	ZEPHYRHILLS	ZEPHYRHILLS		Sep-86	A	2126555	GTDSEAX				

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of GTE Florida Incorporated's Request for Confidential Classification in the foregoing matter was sent via overnight delivery on February 28, 1997 to:

Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
Kimberly Caswell