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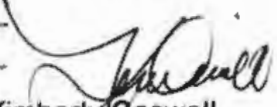
May 9, 1997

Re: Docket No. 950699-TL
Resolution by City Commission of Haines City Requesting Extended
Area Service From Haines City Exchange to All Exchanges Within
Polk County

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Protective Order regarding Late-Filed Exhibits 7 and 9, which were requested by Staff at the hearing in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at (813) 483-2617.

Very truly yours,


Kimberly Caswell

KC:tas
Enclosures

- ACK
- AFB _____
- AFP _____
- CNF _____
- CMC _____
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- EAG _____
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RECEIVED & FILED
A part of GTE Corporation
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
04679 MAY-95
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution by City Commission of)
Haines City requesting extended area service)
(EAS) from Haines City exchange to all)
exchanges within Polk County)
_____)

Docket No. 950699-TL
Filed: May 9, 1997

**GTE FLORIDA INCORPORATED'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, GTE Florida Incorporated (GTEFL) seeks confidential classification and a protective order for late-filed exhibits 7 and 9, requested by Commission Staff at the hearing in this matter. 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 concerns GTEFL's toll calling statistics. This kind of information has been customarily granted confidential protection in past extended area service (EAS) cases. Order No. PSC-97-0361-CFO-TL, in this

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

docket, was issued March 31, 1997 granting confidentiality to traffic data on three of the routes under study.

Exhibit 7 (consisting of three pages) is an extended area service traffic study of the Haines City to Frostproof, Indian Lake, and Polk City exchanges, respectively. It shows calling distribution and messages associated with each of these routes for both business and residence subscribers. Revenue figures are also included.

Both local and intraLATA toll service are now competitive under Florida and federal law. There are scores of alternative local exchange carriers (ALECs) certified on a statewide basis; GTEFL has negotiated and arbitrated local interconnection agreements with numerous entities—including such well-financed companies as AT&T, MCI, and Sprint, and the capability for 1+ IntraLATA presubscription is now available in all of GTE's service territory. In this environment, it is not hard to understand that knowledge of the confidential toll traffic data shown on Exhibit 7 would allow competitors—both toll providers and competitive local exchange companies—to design calling plans and tailor calling scopes to ensure their success in competing with GTE. This advantage is unfair because it would be gained through the regulatory process, rather than through the trial and error that is the hallmark of an openly competitive marketplace.

Exhibit 9 is entitled "Economic Impact of EAS and ECS Under Old Assumptions." It shows the difference between GTEFL's current toll revenues and revenues projected under three scenarios: (1) EAS; (2) extended calling service (ECS); and (3) ECS with 50% stimulation. (GTE emphasizes that the calculations under these three scenarios use assumptions that no longer hold true, as noted in the cover page to Exhibit 9.) Again,

disclosure of this toll-related information would unfairly disadvantage GTEFL and undermine market efficiency. If competitors know GTEFL's existing toll revenues, as well as projected revenues under the toll alternatives of EAS and ECS, they can devise marketing, expansion and entry strategies that will produce the most revenue with the least amount of work.

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 fully 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.

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 Exhibits 7 and 9.

Exhibit 7

Pages 1-3, Columns B-H, Lines 1-28: Toll traffic data, broken down by messages, accounts, and type of service, for the Haines City to Frostproof, Indian Lake, and Polk City routes, respectively.

Exhibit 9

Page 1, Columns B-D, Lines 1-21: Existing toll revenues on routes at issue in this docket, and projected revenues under various alternatives for toll relief.

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.

Respectfully submitted on May 9, 1997.

A handwritten signature in cursive script, appearing to read "Kim Caswell", written over a horizontal line.

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

Attorneys for GTE Florida Incorporated

PROCESSING DATE: 95/05/17
 TIME: 15:27:00
 REPORT ID: WPS09030

NETWORK PROFILE SYSTEM
 E A S STUDY
 POINT TO POINT

STUDY TITLE - ANNUAL CUSTOMER EAS TOLL STUDY
 STUDY DATE - 04/95

COMPANY - (0320) (GTE FLORIDA, INCORPORATED)
 STATE - (FL) (FLORIDA)
 FROM EXCHANGE: (HAINES CITY)
 TO EXCHANGE: (FROSTPROOF)

^A CALLS	^B R E S I D E N C E A C C O U N T S	^C M E S S A G E S	^D B U S I N E S S A C C O U N T S	^E M E S S A G E S	^F A C C O U N T S	^G M E S S A G E S	^H R E V E N U E
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26+
TOTAL

NNNN END OF REPORT NNNN

REDACTED

Docket No. 950698-TL
 David E. Robinson - GTE Florida
 Ltr Filed Exhibit No. 7
 Page 1 of 3

EXHIBIT B

PROCESSING DATE: 95/05/17
 TIME: 15:27:01
 REPORT ID: NPS09030

NETWORK PROFILE SYSTEM
 E A S STUDY
 POINT TO POINT

STUDY TITLE - ANNUAL CUSTOMER EAS TOLL STUDY
 STUDY DATE - 04/95

COMPANY - (0328) (GTE FLORIDA, INCORPORATED)
 STATE - (FL) (FLORIDA)
 FROM EXCHANGE: (HAINES CITY)
 TO EXCHANGE: (POLK CITY)

<i>A</i>	<i>D</i>	<i>C</i>	<i>D</i>	<i>E</i>	<i>F</i>	<i>G</i>	<i>H</i>
CALLS	RESIDENCE ACCOUNTS	MESSAGE MESSAGES	BUSINESS ACCOUNTS	MESSAGE MESSAGES	T ACCOUNTS	O MESSAGE	L REVENUE

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24
25
26+
27
28 TOTAL

*** END OF REPORT ***

REDACTED

Docket No. 880888-TL
 David E. Robinson - GTE Florida
 Late-Filed Exhibit No. 7
 Page 3 of 3

Economic Impact of EAS and ECS Under Old Assumptions

Staff has asked GTEFL to calculate the revenue impact on the Company of EAS and ECS on the routes at issue in this docket. Such financial impact calculations have been feasible to do in the past because they rested on the assumptions that if EAS is ordered, it will foreclose toll competition and that the local exchange company will have 100% of the local (as well as the intraLATA toll) market. These assumptions are no longer true. Under Chapter 364 and the federal Telecommunications Act of 1996, the local exchange has been opened to competition.

In this new environment, it is impossible to know how much market share and revenue GTEFL will lose to its local competitors, which include such formidable challengers as AT&T, MCI, and Sprint. As such, it is impossible to do reliable calculations of revenue impact of EAS and ECS. This exhibit is submitted under the understanding that GTEFL will use the "old" assumptions that held true when GTEFL had a local exchange monopoly. GTEFL emphasizes, however, that it should not and cannot be used as evidence of the revenue impact of mandatory EAS or ECS on GTEFL.

Economic Impact of EAS and ECS Under Old Assumptions

A. EAS	A	B	C	D
	Haines City to:	EAS Revenue	Toll Revenue	Difference
1	Bartow			
2	Frostproof			
3	Indian Lake			
4	Lakeland			
5	Mulberry			
6	Polk City			
7	All			

B. ECS

	Haines City to:
8	Bartow
9	Frostproof
10	Indian Lake
11	Lakeland
12	Mulberry
13	Polk City
14	All

ECS (Stimulated 50%)

	Haines City to:
15	Bartow
16	Frostproof
17	Indian Lake
18	Lakeland
19	Mulberry
20	Polk City
21	All

C. Economic Impact of GTE Local Calling Plan

The Local Calling Plan put forth in this docket is designed to be revenue neutral. The rates for usage as well as the line rates are designed to generate approximately the same amount of revenue as was generated in a toll environment.

REDACTED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of GTE Florida Incorporated's Request for Confidential Classification and Motion for Protective Order regarding Late-Filed Exhibits 7 and 9 in Docket No. 950899-TL were sent via U. S. Mail on May 9, 1997, to the parties listed below.

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