

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI Telecommunications Corporation for an order requiring BellSouth Telecommunications, Inc. to remove its deregulated payphone investment and associated expenses from its intrastate operations and reduce the Carrier Common Line rate element of its intrastate switched access charges by approximately \$36.5 million as required by the Federal Telecommunications Act of 1996

) Docket No. 970172-TP

) Filed: July 23, 1997

In re: Petition by MCI Telecommunications Corporation for an order requiring GTE Florida Incorporated to remove its deregulated payphone investment and associated expenses from its intrastate operations and reduce the Carrier Common Line rate element of its intrastate switched access charges by approximately \$9.6 million as required by the Federal Telecommunications Act of 1996

) Docket No. 970173-TP

In re: Establishment of intrastate implementation requirement governing federally mandated deregulation of local exchange company payphones

) Docket No. 970281-TL

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

GTE Florida Incorporated (GTEFL) seeks confidential classification and a permanent protective order for certain cost information contained in its responses to Staff's First Set of Interrogatories in the above dockets. Specifically, the information in question is the cost figures for GTEFL's coin and B-1 lines contained in GTEFL's response to Staff's Interrogatory No. 7.

DOCUMENT NUMBER-DATE

07399 JUL 23 5

FPSC-RECORDS/REPORTING

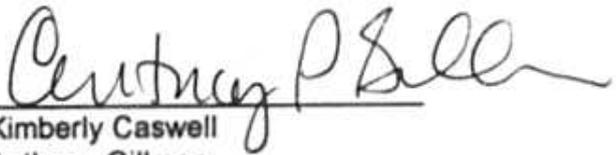
These cost figures fall within Florida Statutes §364.183(3)(e), which defines the term "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." In this case, the cost information in question clearly falls within this definition. The local exchange market is now open to numerous competitors, many of whom are providing, or will provide, payphone services. If those competitors are able to acquire detailed and sensitive costing information regarding GTEFL, they could more easily develop entry and marketing strategies to ensure success in competing with GTEFL. These competitors would be more adept at pricing their own services if they possess details about GTEFL's cost structure. If they know what GTEFL's costs are, they will easily be able to predict GTEFL's response to competitive offers made by other companies. This affords such companies an unfair advantage while severely jeopardizing GTEFL's competitive position.

In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the consumer. It is especially unfair that the information would be disclosed to competitors through a regulatory proceeding--rather than through legitimate market trial and error processes. This effect is particularly troublesome in the context of present regulatory environment in Florida which is intended to foster fair, rational and efficient competition, rather than providing any entity a competitive advantage.

While a ruling on this request is pending, GTEFL understands that the information at issue is exempt from Florida Statutes, Section 119.01(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d). One highlighted, unredacted copy of the confidential material, labeled Exhibit A, is attached to the original of this Request. A redacted copy of the information is attached to this Request as Exhibit B.

Respectfully submitted on July 23, 1997.

By:



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REDACTED

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 First Set of Interrogatories
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Response:

The intrastate Commission expense totaled \$2,914,717. These amounts are included in the total for question 3 (e).

6623.24 Public Telephone Commission - Interstate	\$2,666
6623.25 Public Telephone Commission - Intrastate	\$1,280,082
6623.26 Public Telephone Commission - Local	\$1,631,969

Source: General Ledger

- 6) Based upon GTE's Part 69 Cost Study, what is the average investment, reserve, and deferred taxes associated with pay telephone operations for 1995? Please include both the costs for the lines and the payphones.

Response:

The average intrastate Net Telecommunication Plant totals \$2,663,315. This amount includes only the payphone. The line remains a regulated investment.

- 7) What is the average monthly coin line and B-1 line cost for 1995?

Response:

The coin line cost for 1995 was [REDACTED]. The B-1 line cost for 1995 was [REDACTED]. GTE's cost numbers are confidential and will be filed under a Request for Confidential Classification.

- 8) What is the average monthly coin line and B-1 line rate for 1995 ?

Response:

The average monthly coin line rate for 1995 was \$38.15. The average monthly B-1 line rate for 1995 was \$27.18.