

NANCY B. WHITE
General Attorney

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

November 8, 1993

Mr. Steve C. Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

RE: Docket No. [REDACTED]

Dear Mr. Tribble:

Enclosed are an original and fifteen copies of Southern Bell Telephone and Telegraph Company's Supplement to its Request for Confidential Classification. Please file this document in the above-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, AS
Nancy B. White

ACK

AEA

ASP Enclosures

CAF

cc: All Parties of Record

A. M. Lombardo

H. R. Anthony

R. D. Lackey

EAC

LEA 1

LEB 6

OC

ROB 1

SEP 1

WAS

OTH Kate

DOCUMENT NUMBER-DATE

12048 NOV-8 93

FPD-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of)
the Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern)
Bell Telephone and Telegraph) Filed: November 8, 1993
Company)
_____)

SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
SUPPLEMENT TO ITS REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Supplement to its Request for Confidential Classification filed on October 22, 1993 for certain Company responses to Staff's Thirty-Sixth Set of Interrogatories and Staff's Twenty-Sixth Request for Production of Documents, both dated September 17, 1993.

1. Southern Bell is filing this Supplement to its Request for Confidential Classification for portions of Interrogatory Response No. 705 and Request for Production of Documents Request No. 250 which contain certain information on unregulated Company operations, including revenues for nonregulated and/or competitive current and future services.

2. Southern Bell has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the Interrogatory response and document request response of the information designated by Southern Bell as confidential.

3. The Attachment B (Commission document No. 11452-93) and Attachment C appended to the Original Request for Confidential

DOCUMENT NUMBER-DATE
12048 NOV-83
FPC RECORDS/REPORTING

Classification, dated October 22, 1993, are not appended hereto inasmuch as no changes to those documents are made herein.

4. Regarding Southern Bell's responses to Interrogatory Item No. 705 this response contains competitively sensitive information relating to the forecasted revenue information for future services, which services may be either competitive or nonregulated, and as such the information contained therein is proprietary confidential business information. The services listed in response to Interrogatory No. 705 are those which Southern Bell may provide in the future. Some of these services may be provided on a competitive or nonregulated basis. Companies participating in these markets do not typically share their projected revenue information with their competitors. Section 364.183(3)(e), Florida Statutes, specifically includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as proprietary confidential business information. Interrogatory Response No. 705 specifically identifies such revenues. The structure and profitability of competitive services is considered to be proprietary business information and is not generally shared publicly, and is certainly not shared directly with competitors. Knowledge of discrete elements in a competitor's revenue structure would make it easier to estimate the competitor's overall costs and profit margins. Consequently, knowledge of a competitor's projected

revenue could help in setting strategic pricing in certain markets subject to the greatest competition.

5. The response contains forecasted revenue information. Knowledge of another competitor's revenue and price structure trends for the future clearly places the firm possessing such knowledge in a superior position relative to the other company. Such knowledge could be even more valuable to competitors than past information since it discloses a company's planned financial results and its expectations concerning competitive efforts, as well as market strategies. Some of the services listed are ones to be offered in the near future. Knowledge by competitors as to which services Southern Bell will be offering would give them valuable strategic information. Accordingly, disclosure would give others a competitive advantage which would result in competitive harm and impair the effectiveness of the marketing of future and current services by Southern Bell. If Southern Bell's revenue stream were to be adversely affected, then it could result in an adverse impact on Southern Bell's regulated revenues in the State of Florida.

6. With regard to Southern Bell's response to Staff's Request for Production of Documents Request No. 250, this response contains product specific historic and current (1992 and year to date 1993) revenues from nonregulated services. Competitors and potential competitors for these services and activities would benefit from possession of this information. Section 364.183(3)(e), Florida Statutes, specifically includes

"information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as proprietary confidential business information. Possession of this information would assist Southern Bell's competitors in identifying which particular services are profitable and where to focus facility expansion and marketing efforts.

7. The information contained in Southern Bell's response to Request for Production of Documents No. 250 contains 1992 and year to date 1993 product specific revenues. This information, although somewhat historic, is still current enough to provide competitors with economically valuable data. Southern Bell considers this information to be highly confidential and valuable business information which is not disclosed outside Southern Bell and its affiliates. The recent and current profitability of competitive enterprises is not generally shared publicly and is certainly not shared directly with competitors. Consequently, this information also constitutes trade secrets which are expressly deemed to be proprietary confidential business information pursuant to Section 364.183, Florida Statutes. The disclosure of this information publicly would be detrimental to the competitive interests of Southern Bell and put the Company at a distinct competitive disadvantage.

8. 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 been generally 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 8th day of November, 1993.

SOUTHERN BELL TELEPHONE
AND TELEGRAPH COMPANY

Harris R. Anthony IAB
HARRIS R. ANTHONY
PHILLIP J. CARVER
c/o Marshall M. Criser
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301
(305) 530-5555

R. Douglas Lackey IAB
R. DOUGLAS LACKEY
NANCY B. WHITE
4300 Southern Bell Center
675 West Peachtree St., N.E.
Atlanta, Georgia 30375
(404) 529-3862
(404) 529-5387

ATTACHMENT "A"
FPSC DOCKET NO. 920260-TL
FPSC STAFF'S TWENTY-SIXTH REQUEST FOR
PRODUCTION OF DOCUMENTS, ITEM NO. 250
AND
FPSC STAFF'S THIRTY-SIXTH SET OF
INTERROGATORIES, ITEM NO. 705

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

1. Some of the below listed information contains itemized forecasted revenues which the Company considers Proprietary Confidential Business Information. The revenues and products listed are subject to competition and some of them are unregulated. Therefore, this information is considered Proprietary and Confidential Business Information by Southern Bell and is protected from disclosure by the statutes.
2. Some of the below listed information contains itemized historical revenues which the Company considers Proprietary Confidential Business Information. The revenues and products listed are subject to competition and some of them are unregulated. Therefore, this information is considered Proprietary and Confidential Business Information by Southern Bell and is protected from disclosure by the statutes.

LOCATION OF THE PROPRIETARY INFORMATION

The proprietary information is identified by page, line numbers and column as follows:

<u>PAGE NUMBER</u>	<u>LINE NUMBER</u>	<u>REASON</u>
Item 250/26th POD F01B26Z 0000147-150	All columns adjacent to Account Number 5280 for all SRCs.	Item 2
0000209-212	All columns adjacent to Account Number 5280 for all SRCs.	
Item 705/36th Int.		Item 1
2 of 3	1-16/All revenues listed in the column labeled "1 Year Gross Revenue".	
3 of 3	17-21/All revenues listed in the column labeled "1 Year Gross Revenue".	

ATTACHMENT "B"

Two copies of the document with the confidential information deleted.

ATTACHMENT "C"

One copy of the document with the material which is confidential and proprietary highlighted.

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 8th day of November, 1993 to:

Robin Norton
Division of Communications
Florida Public Service
Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Tracy Hatch
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Grandoff & Reeves
315 South Calhoun Street
Suite 716
Tallahassee, FL 32301-1838
atty for FIXCA

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia and Cox

Kenneth A. Hoffman
Messer, Vickers, Caparello,
Madsen, Lewis & Metz, PA
Post Office Box 1876
Tallahassee, FL 32302
atty for FPTA

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Michael J. Henry
MCI Telecommunications Corp.
780 Johnson Ferry Road
Suite 700
Atlanta, Georgia 30342

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, Florida 32314
atty for MCI

Rick Wright
Regulatory Analyst
Division of Audit and Finance
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0865

Laura L. Wilson, Esq.
c/o Florida Cable Television
Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Chanthina R. Bryant
Sprint Communications Co.
Limited Partnership
3065 Cumberland Circle
Atlanta, GA 30339

Michael W. Tye
AT&T Communications of the
Southern States, Inc.
106 East College Avenue
Suite 1410
Tallahassee, Florida 32301

Dan B. Hendrickson
Post Office Box 1201
Tallahassee, FL 32302
atty for FCAN

Benjamin H. Dickens, Jr.
Blooston, Mordkofsky,
Jackson & Dickens
2120 L Street, N.W.
Washington, DC 20037
Atty for Fla Ad Hoc

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom
& Ervin
305 South Gadsen Street
Post Office Drawer 1170
Tallahassee, Florida 32302
atty for Sprint

Florida Pay Telephone
Association, Inc.
c/o Mr. Lance C. Norris
President
Suite 202
8130 Baymeadows Circle, West
Jacksonville, FL 32256

Monte Belote
Florida Consumer Action Network
4100 W. Kennedy Blvd., #128
Tampa, FL 33609

Donald L. Bell, Esq.
104 East Third Avenue
Tallahassee, FL 32303
Atty for AARP

Gerald B. Curington
Department of Legal Affairs
Room 1603, The Capitol
Tallahassee, FL 32399-1050

Mr. Douglas S. Metcalf
Communications Consultants,
Inc.
631 S. Orlando Ave., Suite 250
P. O. Box 1148
Winter Park, FL 32790-1148

Mr. Cecil O. Simpson, Jr.
General Attorney
Mr. Peter Q. Nyce, Jr.
General Attorney
Regulatory Law Office
Office of the Judge
Advocate General
Department of the Army
901 North Stuart Street
Arlington, VA 22203-1837

Mr. Michael Fannon
Cellular One
2735 Capital Circle, NE
Tallahassee, FL 32308

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman & Metz
Post Office Box 1876
Tallahassee, FL 32302-1876
Attys for McCaw Cellular

Angela Green
Division of Legal Services
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Stan Greer
Division of Communications
Florida Public Svc. Commission
101 East Gaines Street
Tallahassee, FL 32399-0863

Nancy B. White, AB