

MARY JO PEED
General Attorney

Southern Bell Telephone
and Telegraph Company
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 529-7208

ORIGINAL
FILE COPY

September 2, 1994

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 921074-EP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone and Telegraph Company's Fourth Request for Confidential Treatment of its Response to Item No. 60 of Staff's Fifth Set of Interrogatories to be filed in the above mentioned docket.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of Southern Bell's Request have been served on the parties shown on the attached Certificate of Service.

ACK RECEIVED & FILED
AFA _____
APP _____
CAF _____
FPC-BUREAU OF RECORDS

Sincerely,
Mary Jo Peed
Mary Jo Peed (Pw)

CMU *Reith*
Enclosures

CTR _____
EAG cc: Robert G. Beatty
A. M. Lombardo
LEG *Cam* B. Douglas Lackey
Dorothy Bennett
LIN *st* All Parties noted on Certificate of Service
OPC _____
RCH _____
SEC 1
WAS _____
OTH _____

DOCUMENT NUMBER-DATE
09106 SEP-2 94
FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) September 2, 1994

BELLSOUTH TELECOMMUNICATIONS, INC. D/B/A
SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY'S
FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc., d/b/a Southern Bell Telephone and Telegraph Company ("Southern Bell"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its fourth request for confidential classification of information contained in its response to Item No. 60 of the Commission Staff's ("Staff") Fifth Set of Interrogatories.

1. On July 8, 1994, the Staff filed its Fifth Set of Interrogatories to Southern Bell.
2. On August 12, 1994, Southern Bell filed its Objections and Responses to Staff's Fifth Set of Interrogatories and its Fourth Notice of Intent to Request Confidential Classification ("Fourth Notice"). The Fourth Notice was required because the information provided in response to Item No. 60 of Staff's Fifth Set of Interrogatories is exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes.
3. Pursuant to Rule 25-22.006(3)(a), Southern Bell is, within the 21 days allowed by the Rule, filing its request for confidential classification of the information it contends is proprietary confidential business information.

DOCUMENT NUMBER-DATE
09106 SEP-2 1994
FPSC-RECORDS/REPORTING

4. Pursuant to Rule 25-22.006, Florida Administrative Code, Southern Bell is affixing as Attachment "A" a listing identifying the page and line number at which the confidential material found. Southern Bell has affixed as Attachment "B" two copies of the material in which the proprietary confidential business information has been redacted. Appended hereto as Attachment "C" is one copy of the material with the proprietary confidential business information highlighted. The material for which confidential classification is sought is intended to be and is treated by Southern Bell as private and has not been disclosed.

5. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirements of public disclosure of §119.07, Florida Statutes. The information provided in response to Item No. 60 reflects the average cost per access minute of use for switched access service for Southern Bell individually as well as the average cost per access minute of use for switched access service for certain individual independent telephone companies operating in Florida. As to Southern Bell's costs for switched access service, these costs were developed utilizing long run incremental costing theories and as such reflect Southern Bell's costs of providing services on a going forward basis. This information relates to the competitive interests of Southern Bell and disclosure would impair the competitive business of Southern Bell. While it is

true that competition has not been authorized for the local market in Florida for other than pay telephone services, shared tenant services and private line services, the Commission has authorized expanded interconnection for alternative access vendors for special access and private line services and is considering, in this docket, expanded interconnection for alternative access vendors for switched access services. Special access and private line services are also considered to be substitutable services for the switched access services of the local exchange companies. For these reasons, the disclosure of the data contained in response to Item 60 would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services. Further, the access cost information of the various independent telephone companies is provided to Southern Bell pursuant to nondisclosure agreements in place between Southern Bell and the companies. As such, Southern Bell has a duty to protect the information from public disclosure.

WHEREFORE, Southern Bell requests that the Commission grant its request for confidential treatment.

Respectfully submitted this 2nd. day of Sept., 1994.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.
d/b/a SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY

Robert G. Beatty (pm)

ROBERT G. BEATTY
J. PHILLIP CARVER
c/o Marshall M. Criser, III
Suite 400
150 South Monroe
Tallahassee, Florida 32301
(305) 347-5555

Mary Jo Peed (pm)

MARY JO PEED
675 West Peachtree Street, NE
4300 Southern Bell Center
Atlanta, Georgia 30375
(404) 529-7208

CERTIFICATE OF SERVICE
Dockets No. 921074-TL, 930955-TL,
940014-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this *2nd* day of *Sept.* 1994,
to:

Tracy Hatch
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Donna Canzano
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302

Intermedia Communications
9280 Bay Plaza Blvd., #270
Tampa, FL 33619-4453

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

Thomas Parker
GTE Florida Incorporated
P.O. Box 110, MC 7
Tampa, FL 33601-0110

C. Dean Kurtz
Central Tel. Co. of Florida
Post Office Box 2214
Tallahassee, FL 32316-2214

Florida Cable Television
Association, Inc.
310 N. Monroe Street
Tallahassee, FL 32301

Interexchange Access Carrier
Coalition (IACC)
Brad E. Mutschelknaus
Rachel J. Rothstein
Ann M. Szemplenski
Wiley, Rein, & Fielding
1776 K Street, NW
Washington, D.C. 20006

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davison & Bakas
Suite 716
315 South Calhoun Street
Tallahassee, FL 32301

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, FL 32854-1038

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gasdsen Street
Tallahassee, FL 32301

Chanthina R. Bryant
Sprint
3065 Cumberland Circle
Atlanta, GA 30339

Sprint Communications Co.
Ltd. Partnership
c/o Tony Key, Director
3065 Cumberland Circle
Atlanta, GA 30339

Laura L. Wilson, Esq.
c/o Florida Cable Tele-
vision Association, Inc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302

Ms. Janis Stahlhut
Vice Pres. of REG. Affrs.
Time Warner Comm.
Corporate Headquarters
300 First Stamford Place
Stamford, CT 06902-6732

Peter M. Dunbar
Pennington & Haben, P.A.
Post Office Box 10095
Tallahassee, FL 32302

Michael W. Tye
Suite 1410
106 East College Avenue
Tallahassee, FL

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

Lee L. Willis
J. Jeffrey Wahlen
John P. Fons
Macfarlane, Ausley, Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, Florida 34956

John A. Carroll, Jr.
Northeast Telephone Company
Post Office Box 485
Macclenny, Florida 32063-0485

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, Florida 32351

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Teresa Marerro, Esq.
Teleport Communications Group
Inc., Ste. 301
1 Teleport Drive
Statd, NY 10311

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnel & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551

F. Ben Poag
United Telephone Company of FL
P.O. Box 165000
Altamonte Springs, FL 32716

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

Richard D. Melson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, FL 32314

Mary S. Lued
(SWS)

SOUTHERN BELL TEL. & TEL. CO.
FPSC DOCKET 921074-TP
FPSC STAFF'S 5TH SET OF INTERROGATORIES
ITEM NO. 60

Explanation for Confidentiality Request

This information contains average cost per access minute of use for switched access service for Southern Bell and certain independent telephone companies operating in Florida. Because this material discloses actual incremental unit cost information for discrete rate elements for competitive switched access service provided by Southern Bell and the independent telephone companies, it is considered to be proprietary confidential business information. This cost data would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services. In addition, this information is valuable, it is used by Southern Bell and the independents in conducting their business and the LECs strive to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183, Florida Statutes.

LOCATION OF PROPRIETARY INFORMATION

Cost information located on lines 12 and 16 through 24.