

Alan N. Berg Senior Attorney

December 6, 1995

United Telephone Company of Florida Box 165000 Altamonte Springs, Florida 32716-5000 Telephone: 407-889-6018 Fax: 407-889-1211



Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Docket No. 921074-TP-- In re: Petition for expanded interconnection for alternative access vendors within local exchange company central offices by INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.

Dear Mrs. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of United Telephone Company of Florida's and Central Telephone Company of Florida's Request for Confidential Classification concerning cost data required to be filed in the above-captioned Docket.

Thank you for your attention to this matter.

Sincerely,

Alan N. Berg

ANB:tbm Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expanded Interconnection)	Docket No. 921074-TP
for alternative access vendors within local)	
exchange company central offices by)	Filed: December 6, 1995
INTERMEDIA COMMUNICATIONS OF)	
FLORIDA, INC.)	

REQUEST FOR CONFIDENTIAL CLASSIFICATION BY UNITED TELEPHONE COMPANY OF FLORIDA AND CENTRAL TELEPHONE COMPANY OF FLORIDA

United Telephone Company of Florida (United) and Central Telephone Company of Florida (Centel) pursuant to the provisions of Florida Public Service Commission (FPSC) Rule 25-22.006, Florida Administrative Code, request that an order be entered declaring that the information described below is confidential information as that term is defined in Rule 25-22.006(1)(a), F.A.C., and as such is exempt from Section 119.07, Florida Statutes (1993). In support of this Request, United and Centel state that:

- This Request covers cost data of United and Centel which supports the expanded interconnection tariff filings required to be filed by FPSC Order No. PSC-95-1188-FOF-TL, issued September 21, 1995 in the above-captioned dockets.
- 2. Rule 25-22.006(4), F.A.C., requires that confidential information be highlighted, and identified with the page and line at which the confidential material is found, and that the utility correlate the page and line identified as confidential with the specific justification proffered in support of the confidential classification of such material.
- Copies of the documents identified in paragraph 1 above are enclosed with the confidential information highlighted as required by the Rule. The documents with the DOCUMENT NUMBER-DATE.

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specific justification proffered in support of the confidential classification of such material.

- 3. Copies of the documents identified in paragraph 1 above are enclosed with the confidential information highlighted as required by the Rule. The documents with the confidential material highlighted are attached to the original only of this Request as Exhibit "A". Copies of the documents containing the confidential material with the confidential material blocked out with an opaque marker or other masking device are attached to this Request as Exhibit "B". Copies of this Request served on the parties in this matter do not have a copy of Exhibit "A" attached, but do have a copy of Exhibit "B" attached.
- 4. A listing of the pages and lines at which the confidential materials can be found is attached to this Request as Exhibit "C". A listing correlating the pages and lines of the confidential material with the specific justification proffered in support of the confidential classification of the material is attached to this Request as Exhibit "D".
- 5. The material for which confidential classification is sought is intended to be and is treated by United and Centel as confidential and has not been disclosed without being subject to an agreement to maintain its confidential status.
- 6. The confidential material consists of hours, labor rates, cost data and total investment percentages for interconnection pricing for United and Centel, and will remain confidential through the entire course of this docket and thereafter.

 Upon conclusion of this docket, United and Centel request that the confidential information described above be returned to United and Centel.

Wherefore, United Telephone Company of Florida and Central Telephone

Company of Florida request that an order be entered declaring the information

described herein as falling within the specified confidential classification.

Respectfully submitted,

Alan N. Berg

Senior Attorney

United Telephone Company of Florida

P.O. Box 165000

Altamonte Springs, Florida 32716-5000

(407) 889-6018

EXHIBIT "B"

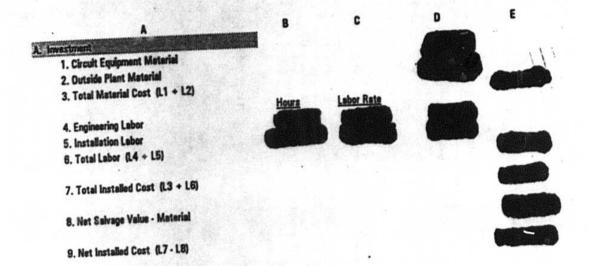
Docket No. 921074-TP-- In re: Petition for expanded interconnection for alternative access vendors within local exchange company central offices by INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.

REQUEST FOR CONFIDENTIAL CLASSIFICATION BY UNITED TELEPHONE COMPANY OF FLORIDA AND CENTRAL TELEPHONE COMPANY OF FLORIDA

Copy of Documents with Confidential Information Marked Out

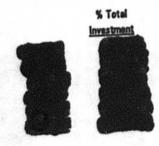
Company: Sprint United of Florida

Rate Element: Intrastate DSO ECC



B. Annual Cost

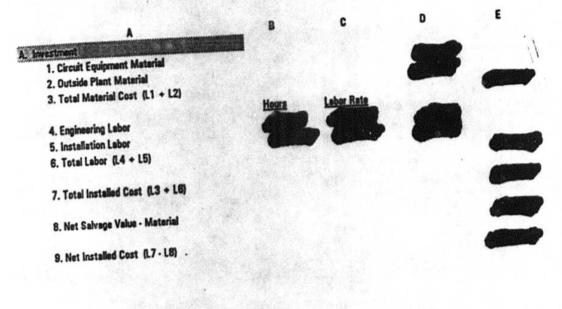
- 10. Depreciation
- 11. Non-recoverable Cost
- 12. Maintenance
- 13. Return
- 14. Federal and State Tax
- 15. Total Annual Cost (L10 thru L14)



C. Pricing	
16. Proposed Nunrecurring Charge	\$1.00°
17. Monthly Direct Cost	PRICE FLOOR
18 PROPOSEO MONTHLY RATE	\$130

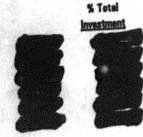
Company: Sprint Centel of Florida

Rate Element: Intrastate DSO ECC



B. Annual Cost

- 10. Depreciation
- 11. Non-recoverable Cost
- 12. Maintenance
- 13, Return
- 14. Federal and State Tax
- 15. Total Annual Cost (L10 thru L14)



C. Pricing 16. Proposed Monrecuring Charge 17. Monthly Direct Cost PRICE FLOOR ...

18. PROPOSEO MONTHLY RATE

EXHIBIT "C"

Docket No. 921074-TP-- In re: Petition for expanded interconnection for alternative access vendors within local exchange company central offices by INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.

REQUEST FOR CONFIDENTIAL CLASSIFICATION BY UNITED TELEPHONE COMPANY OF FLORIDA AND CENTRAL TELEPHONE COMPANY OF FLORIDA

Description of Confidential Information

The following information has be identified as confidential.

United Telephone Company of Florida Exhibit 1

Line 1, Column D, dollar amount

Line 2, Column D, dollar amount

Line 3, Column E, dollar amount

Line 4, Columns B, C and D, hours and dollar amounts

Line 5, Columns B, C and D, hours and dollar amounts

Lines 6, 7, 8 and 9, Column E, dollar amounts

Lines 10 through 15, Columns C and D, dollar amounts and percentages

Line 17, Column D, dollar amount

Central Telephone Company of Florida Exhibit 1

Line 1, Column D, dollar amount

Line 2, Column D, dollar amount

Line 3, Column E, dollar amount

Line 4, Columns B, C and D, hours and dollar amounts

Line 5, Columns B, C and D, hours and dollar amounts

Lines 6, 7, 8 and 9, Column E, dollar amounts

Lines 10 through 15, Columns C and D, dollar amounts and percentages

Line 17, Column D, dollar amount

EXHIBIT "D"

Docket No. 921074-TP-- In re: Petition for expanded interconnection for alternative access vendors within local exchange company central offices by INTERMEDIA COMMUNICATIONS OF FLORIDA, INC.

REQUEST FOR CONFIDENTIAL CLASSIFICATION BY UNITED TELEPHONE COMPANY OF FLORIDA AND CENTRAL TELEPHONE COMPANY OF FLORIDA

Specific Justification to Support Confidential Classification

The following justification is offered for the information listed below:

United Telephone Company of Florida Exhibit 1

Line 1, Column D, dollar amount

Line 2, Column D, dollar amount

Line 3, Column E, dollar amount

Line 4, Columns B, C and D, hours and dollar amounts

Line 5, Columns B, C and D, hours and dollar amounts

Lines 6, 7, 8 and 9, Column E, dollar amounts

Lines 10 through 15, Columns C and D, dollar amounts and percentages

Line 17, Column D, dollar amount

Central Telephone Company of Florida Exhibit 1

Line 1, Column D, dollar amount

Line 2, Column D, dollar amount

Line 3, Column E, dollar amount

Line 4, Columns B, C and D, hours and dollar amounts

Line 5, Columns B, C and D, hours and dollar amounts

Lines 6, 7, 8 and 9, Column E, dollar amounts

Lines 10 through 15, Columns C and D, dollar amounts and percentages

Line 17, Column D, dollar amount

The information claimed as confidential contained in the above-referenced pages and lines consists of hours, labor rates, costs and percentages of total investment for the interconnection of intrastate DS0 service by United and Centel. DS0 service is

currently subject to competition and soon will be subject to a greater level of competition in the United and Centel service territories. Competitors are present and waiting to provide this service. Competition for services will increase as more competitors enter the local service market under the recently enacted legislation at the State level and the pending legislation at the Federal level. Information traditionally available in the monopoly environment has become information that is valuable to competitors and competitive information which should be protected.

Section 364.183(3)(e), Florida Statutes (1993), describes 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 the information."

The information provided concerning the cost of provisioning of DS0 service is information relating to the competitive interests of United and Centel. Disclosure of the information would allow other providers of the service to determine the minimum price at which United and Centel could sell the service and enable other providers of the services a competitive advantage in pricing their service. Such an advantage would impair United's and Centel's ability to compete in the market for the service, and give its competitors an unfair competitive advantage. The revealing of the competitive information would lessen United's and Centel's ability to compete in the marketplace and deprive consumers of service of a viable competitor for the service.

MEMORANDUM

December 6, 1995

TO:	DIVISION OF APPEALS DIVISION OF AUDITING AND FINANCIAL ANALYSIS XX DIVISION OF COMMUNICATIONS DIVISION OF ELECTRIC AND GAS DIVISION OF RESEARCH DIVISION OF WATER AND WASTEWATER DIVISION OF LEGAL SERVICES
FROM:	DIVISION OF RECORDS AND REPORTING (WILLIAMS)
RE:	CONFIDENTIALITY OF CERTAIN INFORMATION
	DOCUMENT NO. 22204-95
	DESCRIPTION: Cost Data supporting expanded inter- connection tariff.
	SOURCE: UNITED/CENTEL DOCKET NO.: 921074-TP
and for memora of voi	The above material was received with a request for dentiality (attached). Please prepare a recommendation for storney assigned to the case by completing the section below browning a copy of this memorandum, together with a brief andum supporting your recommendation, to the attorney. Copies are recommendation should also be provided to the Division of dis and Reporting and to the Division of Appeals.
	Please read each of the following and check if applicable.
-	The document(s) is (are), in fact, what the utility asserts it (them) to be.