

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CINCINNATI BELL TELEPHONE COMPANY S)	
PETITION FOR CONFIDENTIAL TREATMENT OF)	CASE NO.
CERTAIN TERMS AND CONDITIONS OF AN)	2002-00004
INDIVIDUAL CUSTOMER CONTRACT, AND COST)	
DATA IN SUPPORT THEREOF)	

FIRST DATA REQUEST OF COMMISSION STAFF

Cincinnati Bell Telephone Company (CBT), pursuant to 807 KAR 5:001, shall file with the Commission the original and eight copies of the following information, with a copy to all parties of record. The information requested herein is due within 10 days of the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When more than one page is required for an item, each page shall be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided in the format requested herein, reference may be made to the specific location of said information in responding to this information request. The Applicants shall include in each response the name of the individual(s) who provided the information needed or responded to the data request.

1. On December 20, 2001, CBT filed its petition to protect as confidential the identity of a customer who had contracted for Integrated Advantage Service. As grounds for its petition, CBT stated that disclosure of the customer's identity would give

CBT's competitors an unfair advantage by providing them with customer-specific information that could be used to CBT's detriment. With respect to the service to be provided under the contract:

- a. Describe CBT's Integrated Advantage Service.
- b. List the types of customers to whom CBT markets the service.
- c. Describe, for each type of customer marketed, what CBT foresees

the intended use of the service to be.

2. Identify by name each CBT competitor capable of providing a competing service, and with respect to each competitor:

- a. Describe the nature of the competitor's business.
- b. Describe the service that the competitor provides, or is capable of providing, that would compete with CBT's Integrated Advantage Service.
- c. Explain how the competitor's service would compete with CBT's

Integrated Advantage Service.

3. Has CBT conducted any studies, or made any estimates, of the size of the market for Integrated Advantage Service in the market area that CBT and its competitors identified in its response to Item 2 serve?

4. If the answer to Item 3 is affirmative, what percentage of the market for Integrated Advantage Service is currently being served by CBT and what percentage of the market is currently being served by the competitors identified in its response to Item 2?

5. If the answer to Item 3 is negative, what information does CBT have that the competitors identified in its response to Item 2 are providing a service that competes with CBT's Integrated Advantage Service?

6. With respect to the customer whose identity CBT seeks to withhold from public disclosure:

a. Did the customer initiate the contact with CBT about the service, or did CBT initiate the contact?

b. If the contact was initiated by CBT, how did CBT identify this customer as a potential user of Integrated Advantage Service?

c. Which CBT competitors identified in the response to Item 2 are capable of providing a competing service to this customer?

d. Is CBT informed, or has it become otherwise aware, of this customer being offered a competing service by one or more of CBT's competitors?

e. If the answer to Item 6(c) is affirmative, identify the competitor or competitors that offered the service to this customer, and state how CBT became aware of the competitor s offer.

f. Has the customer agreed with CBT to keep this information confidential?



Thomas M. Dorman
Executive Director
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Dated: February 4, 2002

cc: Parties of Record