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ORIGINAL  
FILE COPY

November 16, 1995

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

RE: Docket No. 920260-TL

Dear Mrs. Bayo:

ACK ✓ Enclosed are an original and fifteen copies of BellSouth  
Telecommunications, Inc.'s Request for Confidential  
AFA 2 Classification. Please file this document in the above-captioned  
docket.  
APP 1

CAF \_\_\_\_\_ A copy of this letter is enclosed. Please mark it to  
CMU Porter indicate that the original was filed and return the copy to me.  
CTR \_\_\_\_\_ copies have been served on the parties shown on the attached  
Certificate of Service.

EAG \_\_\_\_\_

LEG 1

LIN 5

OPC \_\_\_\_\_

RCM \_\_\_\_\_

SEC 1

WAS \_\_\_\_\_

OTH \_\_\_\_\_

cc: All Parties of Record  
A. M. Lombardo  
R. G. Beatty  
R. D. Lackey

Sincerely,

*Nancy B. White (BW)*  
Nancy B. White

*NB*

DOCUMENT NUMBER-DATE

11419 NOV 16 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Comprehensive Review of )  
the Revenue Requirements and Rate )  
Stabilization Plan of Southern )  
Bell Telephone and Telegraph )  
Company )

Docket No. 920260-TL

Filed: November 16, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or the "Company"), pursuant to Rule 25-22.006(3)(a) and (4), Florida Administrative Code, and files its Request for Confidential Classification for certain information contained in Staff's Surveillance Audit Report for the 12 months ending December 31, 1994, and supporting workpapers.

1. During 1995, Staff conducted audit field work on BellSouth's schedules of Rate Base, Net Operating Income, and Capital Structure for the twelve month period ending December 31, 1994 as prepared by BellSouth for its Surveillance Report. Staff has now completed its field work relating to these efforts.

2. On October 2, 1995 a telephonic audit exit conference was held with representatives of both Staff and BellSouth. Staff has identified certain documents and information that it desires to include in its audit workpapers to support its audit in this docket. BellSouth received a copy of the final audit report.

3. Pursuant to Rule 25-22-006(3)(a) and (4), Florida Administrative Code, BellSouth is hereby filing its Request for Confidential Classification for certain portions of Staff's Surveillance Audit Report for the twelve months ending December 31, 1994, and supporting workpapers. These documents contain

DOCUMENT NUMBER-DATE

11419 NOV 16 88

FPSC-RECORDS/REPORTING

numerous categories of proprietary confidential business information which will be discussed in detail hereafter.

4. Pursuant to Rule 25-22.006(4)(c), BellSouth has included three attachments with this filing:

5. Attachment A is a listing showing the location in the subject documents of the information designated by BellSouth as confidential.

6. Attachment B contains two edited copies of the subject documents with the confidential information deleted. Copies of Attachment B are not being served on the other parties in this proceeding.

7. Attachment C is a sealed package containing copies of the documents with the material which is confidential and proprietary highlighted. Copies of Attachment C are not being served on the other parties in this proceeding.

#### AUDIT REPORT AND WORKPAPERS

8. The final audit report and the supporting workpapers contain proprietary, confidential business information. The specific categories of such information will be discussed below.

##### A. INFORMATION DERIVED FROM INTERNAL AUDITS

9. With respect to the portions of the documents contained in the Staff's audit report and workpapers for the Surveillance Report Audit, referenced in Attachment A as containing internal audit reports or information derived from internal audit reports, including the specific findings, conclusions, or recommendations contained in such reports, this information is entitled to

confidential classification pursuant to Section 364.183(3)(b), Florida Statutes. BellSouth has noted the readily identifiable portions in the audit report and workpapers which contain copies of internal audit reports or information that makes specific reference to these internal audit reports, findings, conclusions, recommendations and related information and requests that this information as indicated be classified as confidential information, and therefore exempt from the public inspection and examination provisions of Section 119.07(1)(a), Florida Statutes. The auditors either copied internal audit reports in their entirety or extracted information from the internal audits from a review of the internal audits themselves or from excerpts of such audits and findings found in the workpapers of BellSouth's internal and external auditors. In either case, since the reports of internal auditors themselves are deemed to be proprietary confidential business information, it logically follows that excerpts taken directly from such reports relating the findings, conclusions and the like is similarly entitled to the same protection. The Commission has previously recognized that this type of information is entitled to confidential classification. PSC-93-1062-CFO-TL, issued September 21, 1993 in these consolidated dockets. Order No. 25297, issued November 5, 1991 in Docket No. 890190-TL, and affirmed in Order No. PSC-92-0135-FOF-TL, issued March 31, 1992.

B. EMPLOYEE PERSONNEL INFORMATION UNRELATED TO COMPENSATION, DUTIES, QUALIFICATIONS OR RESPONSIBILITIES

10. With respect to the portions of the audit report and workpaper documents referenced in Attachment A as containing employee-personnel information unrelated to compensation, duties, qualifications, or responsibilities, such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information. This information includes Company employees' social security numbers. The Commission has consistently recognized the legitimate privacy interests possessed by such employees as it relates to such information and has previously recognized that this type of information is entitled to confidential classification. Order No. 24457, issued May 1, 1991 in Docket No. 890190-TL.

C. AUDIT STRATEGY, CONTROLS, WORK PROGRAMS AND METHODOLOGIES OF EXTERNAL AUDITORS

11. With respect to the portions of the audit report and supporting workpaper documents referenced in Attachment A as containing information relating to the auditing strategy, controls, work programs and methodologies used by BellSouth's external auditors, this information is entitled to confidential classification on the basis that they constitute the proprietary work product of such firm and is considered competitively valuable by these external auditors. Thus, pursuant to Section 364.183(3)(e), Florida Statutes, this information is entitled to confidential classification.

12. These strategies, controls, work programs and methodologies are internally developed by Coopers and Lybrand (C&L), BellSouth's external auditors, are unique to that firm and collectively represent the firm's audit program. Such information relates to the external auditor's competitive accounting practices and procedures employed to provide its services to clients and is not otherwise publicly available. Consequently, this is information relating to such competitive interests, the disclosure of which would harm C&L's competitive business interests if publicly disclosed. If C&L's competitors were to gain public access to its audit methodologies, C&L would be competitively and financially harmed. If the information came into the hands of a C&L competitor, that competitor would have the advantage of knowing a particular audit strategy and work program methodology which has been developed internally by C&L. Without this information, C&L's competitors would have to spend their own money and resources in order to create similar work strategies and work program methodologies. Therefore, in accord with Section 364.183(e), Florida Statutes, this information should be kept confidential because it relates "to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." The audit workpapers include much of the process-related steps employed by C&L in conducting their review of the Company. The information contained in these documents discloses the blueprint used by C&L

to conduct its analyses, and has step-by-step procedures and analytical results from such procedures.

13. This Commission has previously held that such audit strategy and work program methodologies are entitled to confidential classification. PSC-93-1062-CFO-TL, issued September 21, 1993 in these consolidated dockets; Order No. 25297, issued November 5, 1991 in Docket No. 890190-TL; affirmed in Order No. PSC-92-0135-TL, issued March 31, 1992.

D. VENDOR SPECIFIC CONTRACTUAL AND OTHER INFORMATION

14. With respect to the portions of the audit report and supporting workpaper documents referenced in Attachment A as containing vendor-specific contractual and other information, this information is entitled to confidential classification pursuant to Section 364.183(3) and (3)(d), Florida Statutes. The workpapers contain vouchers, bills and other references to vendor-specific pricing negotiated by BellSouth and details of competitive contracts. Public disclosure of this information would impair the Company's ability to contract for similar goods and services in the future on favorable terms. BellSouth often has opportunities to negotiate bulk discounts or other favorable pricing with its vendors. These vendors require that the terms of these contractual arrangements be kept confidential in order to avoid undue pressure from other customers to reduce prices or to give them similar terms and conditions in their contacts. Through public disclosure of such contractual information, these vendors providing crucial products and services to BellSouth

could likely react by increasing BellSouth's prices or adversely changing favorable terms and conditions rather than lowering all other potential customers' prices for similar services or products or providing similar contractual arrangements enjoyed by BellSouth. Also, if vendor-specific information were subject to public disclosure, these vendors may withhold valuable information regarding proprietary product or service capabilities which must be available for proper evaluation by BellSouth to fully analyze proposals from vendors in future negotiations. Moreover, if other vendors had access to the prices BellSouth is currently paying for its services, such vendors would be in an unfair bargaining position relative to BellSouth in future contract negotiations. Any of these results would cause harm to BellSouth in its operations and could tend to increase the Company's cost of doing business which, in turn, would be harmful to BellSouth's ratepayers. Thus, Section 364.183(3)(d), Florida Statutes provides that this information is proprietary confidential business information exempt from the public inspection and examination provisions of Section 119.07(1), Florida Statutes. Finally, pursuant to private agreements entered into with its vendors, BellSouth is under an obligation not to release this information to the public. Section 364.183(3), Florida Statutes, specifically provides that proprietary confidential business information includes information possessed by the Company which is subject to existing



non-disclosure agreements with third parties, which if released, could be harmful to the Company.

E. COST TO PROVIDE CERTAIN SERVICES

15. With respect to the portions of the audit report and workpapers referenced in Attachment A as containing information reflecting BellSouth's cost to provide certain services, this information is entitled to confidential classification pursuant to Section 364.183 (3)(d) and (e), Florida Statutes. The information is in the form of both billing and collection costs incurred by BellSouth in providing its billing and collection services as well as specific billing and collection costs allocated or billed to the Company's non-regulated operations or affiliates and other information such as bill lines printed that could be used to derive costs per billed line.

16. BellSouth's costs to provide certain services are proprietary business data, the public disclosure of which could be harmful to BellSouth. Competitors could gain a competitive advantage if allowed unrestricted access to this information. This data could give competitors a clear picture of the costs required to provide services offered by BellSouth. Knowledge of such costs could easily allow a competitor to assess its potential in the market and facilitate its decision of whether or not to enter the market and when. Moreover, knowledge of BellSouth's costs would allow competitors to gauge BellSouth's theoretical price floor for these services, and thereby allow competitors to unfairly price their alternative services.

F. INFORMATION RELATING TO COMPETITIVE  
INTERESTS AND UNREGULATED OPERATIONS

17. With respect to the portion of the audit report and workpapers referenced in Attachment A as containing competitively sensitive information relating to the financial operations of several of BellSouth's unregulated affiliates. Such information contained therein is proprietary confidential business information under § 364.183(3)(e), Florida Statutes. This information contains actual and forecast unregulated expenses, as well as net income information and forecasted revenue information.

18. The business of these unregulated affiliates is a competitive business, and companies participating in these markets do not typically share their expenses, profit margins and 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. The cost structure and profitability of competitive enterprises is considered to be proprietary business information and is not generally shared publicly, and is certainly not shared directly with competitors of these companies. Knowledge of discrete elements in a competitor's cost structure in the context of these competitive businesses, would make it easier to estimate the competitor's overall costs which must be covered through revenues. Consequently, knowledge of a competitor's costs could

help in setting strategies in certain markets subject to the greatest competition.

19. Knowledge of another competitor's revenue and cost 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. Accordingly, disclosure would give others a competitive advantage which would result in competitive harm and impair the effectiveness of BellSouth's unregulated affiliate's business.

20. In accordance with Rule 25-22.006, Florida Administrative Code, the information for which confidential treatment is sought is intended to be and is treated by the Company as private and has not been disclosed on a non-confidential basis.

WHEREFORE, BellSouth moves the Prehearing Officer to enter an Order declaring the information described above, and contained in the indicated portions of the document responses to be confidential, proprietary business information and thus not subject to public disclosure.

Respectfully submitted this 16th day of November, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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c/o Nancy Sims

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**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 16th day of November, 1995

to:

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*Nancy B. White (pw)*

**ATTACHMENT A**

**FPSC DOCKET 920260-TL**

**FPSC STAFF AUDIT OF  
1994 SURVEILLANCE REPORT**

**JUSTIFICATION FOR CONFIDENTIALITY REQUEST**

**Attached is a list of Reasons Why Items are Proprietary, Items A through F.**

**LOCATION OF THE PROPRIETARY INFORMATION**

**Attached is a list (pages 1 - 6) of the Workpaper binders, page numbers, and line numbers which contain proprietary information. This list shows a code for the reason the line items are proprietary, as described in the page "Reasons Why Items are Proprietary".**

## REASONS WHY ITEMS ARE PROPRIETARY

A. This information reflects vendor specific pricing and/or contractual terms negotiated by Southern Bell. Public disclosure of this information would impair Southern Bell's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183(3)(d), Florida Statutes such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

B. This information reflects Southern Bell's cost to provide certain services. The public disclosure of this information would provide Southern Bell's competitors with an advantage in that they would know the price or rate below which Southern Bell could not provide the service. Southern Bell is not able to obtain its competitor's cost to provide service, therefore, it would be inequitable and unfair for Southern Bell's competitors to have access to Southern Bell's cost information. In addition, this information is valuable, it is used by Southern Bell in conducting its business and southern Bell strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), Florida Statutes and is exempt from the Open Records Act.

C. This information relates to competitive interests and/or unregulated operations, the disclosure of which would impair the competitive business and/or unregulated operations of Southern Bell. Such information is specifically considered to be proprietary, confidential business information pursuant to Section 364.183 (3)(e), Florida Statutes.

D. This information reflects employee personnel information unrelated to compensation, duties, qualifications or responsibilities. As such, this information is classified as confidential business information pursuant to Section 364.183(3)(f), Florida Statutes, and is exempt from the Open Records Act.

E. This information includes copies of and/or summaries of internal audit reports. Such information is specifically considered to be proprietary, confidential business information pursuant to Section 364.183 (3)(b), Florida Statutes, and is exempt from the Open Records Act.

F. This information includes copies of and/or summaries of external auditors' workpapers. Reference is made to two letters from Coopers & Lybrand to the Florida Public Service Commission (FPSC) dated June 12, 1995, requesting confidential treatment, and the response from Tim Devlin of the FPSC dated June 15, 1995. This information should be given the same treatment as internal audit information, which is considered to be proprietary, confidential business information pursuant to Section 364.183 (3) (b), Florida Statutes, and is exempt from the Open Records Act.



**FPSC Staff Audit**  
**1994 Surveillance Report**  
**Summary of Proprietary Information**  
**Included in Auditor Workpapers and Audit Report**

	<u>Binder</u>			<u>Why</u>
	<u>Ref</u>	<u>Page Number</u>	<u>Line(s)/ Column(s)</u>	<u>Proprietary</u>
1	Report	5	2-31	E
2	Report	18	7-36	F
3	Report	19	7-25	F
4	2	9	All	E
5	2	9-1, pp. 1-17	All	E
6	2	9-1/1, p. 1	All	E
7	2	9-1/1-1, p. 1	19-28	E
8	2	9-1/1-1, p. 2	9-19	E
9	2	9-1/2, p. 1	17-22	E
10	2	9-1/2, p. 2	All	E
11	2	9-1/2, p. 3	All	E
12	2	9-2, pp.1-32	All	E
13	2	9-2/1, pp. 1-4	All	E
14	2	9-2/1, p. 10	All	E
15	2	9-2/2,	5-9	E
16	2	9-3, pp. 1-15	All	E
17	2	9-3/1, p. 1	16-23	E
18	2	9-3/1, p. 2	9-11	E
19	2	9-4, pp. 1-34	All	F
20	2	9-5, pp. 1-34	All	F
21	2	9-5/1, pp. 1-3	All	F
22	2	10-14, p. 1	14-19	E
23	2	10-14, p. 2	14-19	E
24	2	10-16	13-22	E
25	2	10-17	13-14, 16-22	E
26	3	10-43, p. 1 of 23	13-19	E
27	3	10-46, p. 4	All	E
28	3	10-49, p. 2	All	F
29	3	10-60, p. 2	All	F
30	3	10-71, p. 4	7-49	B,C
31	3	10-71, p. 5	5-52	B,C
32	3	10-71, p. 6	5-38	B,C
33	3	10-71, p. 7	5-52	B,C
34	3	10-71, p. 8	5-52	B,C
35	3	10-71, p. 9	5-52	B,C
36	3	10-71, p. 10	5-28	B,C
37	3	10-72, p. 4	4, 25	D
38	3	10-72, p. 4	30, 35, 37	A
39	3	10-72, p. 5	14-17, 20, 25-26, 29-31, 37	A
40	3	10-72, p. 6	13-33	A
41	3	10-72, p. 7	13-38	A
42	3	10-72, p. 8	13-24	A
43	3	10-72, p. 9	13-38	A
44	3	10-72, p. 10	14-43	A

**FPSC Staff Audit**  
**1994 Surveillance Report**  
**Summary of Proprietary Information**  
**Included in Auditor Workpapers and Audit Report**

<u>Binder</u>				<u>Why</u>
<u>Ref</u>	<u>Page Number</u>	<u>Line(s)/ Column(s)</u>	<u>Proprietary</u>	
45	3	10-72, p. 11	14-33	A
46	3	10-72, p. 12	14-23	A
47	3	10-72, p. 13	14-43	A
48	3	10-72, p. 14	14-38	A
49	3	10-72, p. 15	14-25	A
50	3	10-72, p. 16	14-44	A
51	3	10-72, p. 17	14-27	A
52	3	10-93, p. 3	17, 22, 27, 29	A
53	3	10-93, p. 4	20, 24	A
54	4	12-3, p. 9	8-55	C
55	4	12-3, p. 10	7-57	C
56	4	12-3, p. 11	7-57	C
57	4	12-3, p. 12	7-22	C
58	5	21-1, pp. 1-2	All	F
59	6	31-1/2-1/1, p. 1 of 2	All	F
60	6	31-1/2-1/1, p. 2 of 2	All	F
61	6	31-1/2-1/2, p. 1 of 2	All	F
62	6	31-1/2-1/2, p. 2 of 2	All	F
63	6	31-1/2-1/3, p. 1 of 2	All	F
64	6	31-1/2-1/3, p. 2 of 2	All	F
65	6	31-1/2-1/4, p. 1 of 2	All	F
66	6	31-1/2-1/4, p. 2 of 2	All	F
67	6	31-1/2-2, p. 1	All	F
68	6	31-1/2-2, p. 2	All	F
69	7	40-1/2-1/1-2 p3	17	D
70	7	40-1/2-1/1-2 p5	15	D
71	7	40-1/2-1/1-7/1 p2	6 b&c thru 43 b&c	A
72	7	40-1/2-1/1-7/1 p4	13 c&d thru 52 c&d	A
73	7	40-1/2-4/7 p2	17	D
74	8	40-1/2-6/1-1/1 p1	12 b thru 14 b	A
75	8	40-1/2-6/1-1/1 p2	18	D
76	8	40-1/2-6/1-1/1 p3	12 b thru 17 b	A
77	8	40-1/2-6/1-1/1 p4	18	D
78	8	43 p2	9 thru 11	F
79	8	43-1/4-2/2 p4	18	D
80	8	43-1/4-2/2 p4	33,35,37,39,41,43,45	A
81	8	43-1/4-2/2 p5	30	A
82	8	43-1/4-2/2 p7	3,5,7,9,11,13,15	A
83	8	43-1/4-2/2 p8	21 b thru 35 b	A
84	8	43-1/4-2/2 p9	22 b thru 36 b	A
85	8	43-1/4-2/2 p10	10 e thru 23 e	A
86	8	43-1/4-2/2 p12	10 e thru 27 e	A
87	8	43-1/4-2/2 p13	10 e thru 26 e	A
88	8	43-1/4-2/2 p14	10 e thru 26 e	A

**FPSC Staff Audit  
1994 Surveillance Report  
Summary of Proprietary Information  
Included in Auditor Workpapers and Audit Report**

	<u>Binder</u>		<u>Line(s)/ Column(s)</u>	<u>Why</u>
	<u>Ref</u>	<u>Page Number</u>		<u>Proprietary</u>
89	8	43-1/4-2/2 p15	10 e thru 26 e	A
90	8	43-1/4-2/2 p16	10 e thru 26 e	A
91	8	43-1/4-2/2 p17	11 e thru 25 e	A
92	8	43-1/4-2/2 p18	11 e thru 26 e	A
93	8	43-1/4-2/2 p19	11 e thru 28 e	A
94	8	43-1/4-2/2 p20	11 e thru 25 e	A
95	8	43-1/4-2/2 p21	11 e thru 26 e	A
96	8	43-1/4-2/2 p22	11 e thru 24 e	A
97	8	43-1/4-2/2 p23	11 e thru 33 e	A
98	9	44-3/2-1 p2	22	D
99	9	44-3/2-2 p2	22	D
100	9	44-3/3 p1	9,20	A
101	9	44-3/3 p3	1 c thru 17c & 1 e thru 29 e	A
102	9	44-3/3 p4	1 c thru 20 c	A
103	9	44-3/4 p1	10,12,16,21,22,26,27	A
104	9	44-3/4 p2	10a,12	A
105	9	44-3/4-1 p1	5,7,10	A
106	9	44-3/4-1 p2	18g,21g	A
107	9	44-3/4-1 p3	All	A
108	9	44-3/4-1 p4	21b-26b	A
109	9	44-3/4-1/2	22b-27b	A
110	9	44-3/4-2 p1-p11	All	A
111	9	44-3/5	10,12,17	A
112	9	44-3/8	10,11,12,17	A
113	9	44-3/8-1	37,39,40,41	A
114	9	44-3/8-2	9a thru 14a & 9c thru 16c	A
115	9	44-3/8-3	All	A
116	9	44-3/9	10,11,12,17	A
117	9	44-3/9-1 p1	34,36,37	A
118	9	44-3/9-1 p2	9a thru 14a & 9c thru 16c	A
119	9	44-3/10	10,14,15	A
120	9	44-3/10-1 p1	5,7,10	A
121	9	44-3/10-1 p2	18h,19h	A
122	9	44-3/10-1 p3	22b&d thru 25b&d, 22f thru 27f, 41b thru 43b, 41d thru 44d, 45b thru 49b, 50c	A
123	9	44-3/10-1 p4	All	A
124	9	44-3/10-2	9a,10a, 9c thru12c	A
125	9	44-3/11	10c, 13, 18, 19	A
126	9	44-3/11-1	5q, 7q, 9q, 11q	A
127	9	44-3/12	10c, 13, 18, 19	A
128	9	44-3/12-1	27r, 31r, 32r, 33r	A
129	9	44-3/13	10c, 18	A
130	9	44-3/3-1	All	A

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131	9		44-3/14	10c, 12, 14	A
132	9		44-3/15	10c, 14, 19, 20	A
133	9		44-3/15-1 p1	15r, 17r, 18r, 24r, 25r	A
134	9		44-3/15-1 p2	9 a thru 14a, 9c thru 16c	A
135	9		44-3/16	10c, 11, 12	A
136	9		44-4/1 p1	10f	A
137	9		44-4/1 p2	39, 41, 42, 46	A
138	9		44-4/1 p5	5e thru 9e & 5f thru 9f	A
139	9		44-4/1-1 p2	6, 12, 13	A
140	9		44-4/1-4 p1	11b thru 29b & 11c thru 29c	A
141	9		44-4/1-4 p2	22b&e, 30b&e, 38b&e	A
142	9		44-4/1-4 p3	22a&d, 33a&d, 44a&d	A
143	9		44-4/1-4 p4	22a&d, 25a&d, 29a&d, 33a&d, 37a&d	A
144	9		44-4/1-4 p5	22a&d, 25a&d, 30a&d, 38a&d	A
145	9		44-4/1-4 p6	22a&d, 27a&d, 30a&d, 35a&d, 38a&d	A
146	9		44-4/1-4 p7	22a	A
147	9		44-5/1 p1	11f, 28c	A
148	9		44-5/1 p2	12c	A
149	9		44-6/1-1 p12	10b, 28	B
150	9		44-6/1-1 p13	10b, 29	B
151	9		44-6/1-1 p14	10b	A
152	9		44-6/1-1	6b, 8b, 10b, 12b, 14b, 16b, 18b, 20b, 22b, 24b, 26b, 28b, 30b, 32b, 34b, 36b	D
153	9		44-6/1-2	16, 17	A
154	9		44-6/1-3 p1	5, 7, 10	A
155	9		44-6/1-3 p2	13, 21	A
156	9		44-6/1-3 p2	19	D
157	9		44-6/1-3 p3	11, 15, 17	A
158	9		44-6/1-4 p1	5, 7, 10	A
159	9		44-6/1-4 p2	15, 21	A
160	9		44-6/1-4 p2	19	D
161	9		44-6/1-4 p3	8b, 13, 21	A
162	9		44-6/1-10/1 p2	23	D
163	10		44-10/1-2 p2	21	D
164	10		44-10/1-2 p7	20b thru 25b, 20c thru 25c	A
165	10		44-10/2-2 p5	22	D
166	10		44-13/1 p1	All of column C & 28	A
167	10		44-13/1 p2	15c, 20c, 27c, 36c	A
168	10		44-13/1 p3	23f, 31f	A
169	10		44-13/1 p4	15c, 21f, 27f, 32f	A
170	10		44-13/1 p5	17f	A

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172	10	44-13/3-1 p2	18, 24	A
173	10	44-13/3-1 p2	22	D
174	10	44-13/3-1 p4	All of column E	A
175	10	44-13/3-1 p5	All of column E, 19g, 27	A
176	10	44-13/4	13	A
177	10	44-13/4-1 p1-p7	All	A
178	10	44-13/4-2 p2	13, 21, 32	A
179	10	44-13/4-2 p2	19	D
180	10	44-13/4-2 p4	14i, 14k, 16k, 23k, 25d, 27b	A
181	10	44-13/5	4, 7	A
182	10	44-13/5-1 p2	11, 18, 29	A
183	10	44-13/5-1 p2	16	D
184	10	44-13/5-1 p3	17d, 19d, 22d	A
185	10	44-13/5-2 p1-p40	All	A
186	10	44-13/6-1 p2	20	D
187	10	44-13/6-1 p3	27e thru 43e, 27f thru 43f	A
188	10	44-13/7-1 p2	11, 18, 28	A
189	10	44-13/7-1 p2	16	D
190	10	44-13/7-1 p4	10i, 10k, 12k, 18k, 22d, 23b	A
191	10	44-14/1	17d	A
192	10	44-14/2 p2	16, 25, 27, 31	A
193	10	44-14/2 p2	20	D
194	10	44-14/2 p3	5, 6	A
195	10	44-114/2 p4	19, 22, 24, 25	A
196	10	44-14/2 p5	15, 17 thru 22	A
197	10	44-15/2 p11	6b thru 43b, 6c thru 43c	A
198	10	44-15/2 p13	5c thru 15c, 6d thru 15d	A
199	10	44-15/2 p14	5c thru 31c, 5d thru 31d	A
200	10	44-15/3	12, 13	A
201	10	44-15/3-1	5, 7, 9, 22, 23, 24, 25, 26	A
202	11	57-1 p1-p3	All	F
203	11	57-2/5-2	8i, 10i, 16i, 17i, 18i, 20i, 23i, 24i	A
204	11	57-1/2 p1-p7	All	F
205	11	57-2/5-6 p1	8i, 10i, 16i, 17i, 18i, 20i, 23i, 24i	A
206	11	57-2/5-6 p2	10h, 17h, 18h, 22h, 23h, 7i thru 9i, 14i, 15i, 19i, 21h, 22i, 25h, 26i, 27i, 28i	A
207	11	57-2/6	7, 8, 13 thru 22	F
208	11	57-2/6-1	7	F
209	12	47-1 p1-p3	All	F
210	12	47-2 p1-p4	All	F
211	12	47-3 p1-p4	All	F

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213	12	47-4/1-3/1	C
214	12	48-2 p1-p15	F
215	12	49	F
216	12	49-1	F
217	12	49-1/1	F
218	12	49-2 p1	F
219	12	59-3/1	B

**NOTE: "Why Proprietary" column references "Reasons Why Items are Proprietary" document.**