

ORIGINAL
FILE COPY

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BellSouth Telecommunications, Inc.
150 South Monroe Street
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October 25, 1996

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

RE: Docket No. ~~80000~~-TP; 960846-TP; 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents in the 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
(NW)

Nancy B. White

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~1139~~ OCT 25 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)
Communications of the Southern)
States, Inc., MCI) Docket No. 960833-TP
Telecommunications Corporation,)
MCI Metro Access Transmission)
Services, Inc., American) Docket No. 960846-TP
Communications Services, Inc.)
and American Communications)
Services of Jacksonville, Inc.) Docket No. 960916-TP
for arbitration of certain terms)
and conditions of a proposed)
agreement with BellSouth)
Telecommunications, Inc.)
concerning interconnection and) Filed: October 25, 1996
resale under the)
Telecommunications Act of 1996)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"),
pursuant to Rule 25-22.006, Florida Administrative Division Code, and
files its Request for Confidential Classification and Motion for
Permanent Protective Order for the Late Filed Deposition Exhibits of
Daonne Caldwell in the above captioned dockets.

1. BellSouth is filing its Request for Confidential
Classification for the Caldwell Deposition Exhibits because it deems
the information requested to be confidential and proprietary business
information in that it reflects vendor specific prices and revenue and
cost data. Since competitors who will offer local services can use
this information as a resource, disclosure of this information would
impair BellSouth's ability to compete.

DOCUMENT NUMBER-DATE

11391 OCT 25 8

FPSC-RECORDS/REPORTING

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the response with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the response with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. This information contains revenue and cost data which reflects BellSouth's long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth 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, Florida Statutes and is exempt from the Open Records Act. The information contained in Caldwell's Deposition Exhibits, as more

specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

BellSouth 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, BellSouth moves the Commission to enter an order declaring the information described above and contained in the indicated portions of the Caldwell Deposition Exhibits to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 25th day of October, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (pro)

ROBERT G. BEATTY
J. PHILLIP CARVER
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Tallahassee, Florida 32301
(305) 347-5555

R. Douglas Lackey (pro)

R. DOUGLAS LACKEY
NANCY B. WHITE
675 W. Peachtree Street
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Atlanta, Georgia 30375
(404) 335-0710

CERTIFICATE OF SERVICE
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 25th day of October, 1996 to the following:

Staff Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

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1200 19th Street, N.W.
Washington, D.C. 20036


Nancy B. White

CERTIFICATE OF SERVICE

DOCKET NO. 960833-TP

DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 25th day of October, 1996 to the following:

Tracy Hatch
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Nancy B. White (for)

ATTACHMENT A
Request for Confidential Classification
Page 1
10/25/96

ATTACHMENT A

FPSC 960833/846-916-TP

LATE FILED DEPOSITION EXHIBITS
OF
DAONNE CALDWELL TAKEN 9/27/96 & 10/7/96

Explanation of Proprietary Information

This information contains costs which reflect BellSouth's total service and total element long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. This same information on competitors is not available to BellSouth. Additionally, this information is valuable to BellSouth in that it is used by BellSouth in the conduct of its business and BellSouth strives 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 THE PROPRIETARY INFORMATION

PAGE NO.

LINE/COL. NO

Exhibit # 2

Page 32	Col. A, Lines 24,27,30,31,34,35
33	Lines 5,6,9,10
37	Cols. Unit Inv/Totalinv, Lines 7-11, 13-17,19-23,25-29,31-35,37-41,43-46
38	Cols. Unit Inv/Totalinv, Lines 7-12, 14-18,20-24,26-30,32-36,38-42,44-46
39	Cols. Unit Inv/Totalinv, Lines 6,7,9-13, 15-19,21-25,27-31,33-37,39-43,45,46
40	Cols. Unit Inv/Totalinv, Lines 6-8,10-14, 16-20,22-26,28-32,34-38,40-46
41	Cols. Unit Inv/Totalinv, Lines 6-16,21-25, 27-31,33-37,39-43

PAGE NO.

LINE/COL. NO.

Page 42	Cols. Unit Inv/Totalinv
44	Line 11
47-49	Cols. Average Inv, Total Monthly Cost, Levelized Monthly Cost
58,61,63	Cols. First, Addtl, Lines 3-9
59,62,64	Cols. A,B,D-G
70	Cols. A-F, Lines 30-32

Exhibit 2 (TSLRIC) Item no. 2

152	Lines 4,5,7,8,10,11
153-155	Col. Expense in 1994
156,161,165-169	Cols. A-C
157-160,162,163	Cols. 1994-1997
164	Cols. 1994-1997,marginalia
171	Cols. 1994-1997, Lines 4,5,7-12, 14-19,22-24
175-191	Cols. A-G
192-194	Cols. A-K
211	Cols. A-I
212,213	Cols. Jan-Dec, 1995-1997
223	Col. A
224	Col. A, Lines 6,26-29,33-36,38,42-44, 49-51,53
225	Col. A, Lines 6,26-29,33-36,38,40,42, 44,46,48,52,54
227-230	Col. A, Lines 5-9,18,20-28
232	Cols. E,G,I,K,M
234	Col. Levelized Inv
235	Cols. A/B, Line 15, Cols. A,C-E
236	Cols. A/B, Line 12, Cols. A,C-E
239	Cols. A, Lines 1,10
241-247	Col. A, Lines 5-9,18,20-28
251	Cols. K,M
252	Cols. K, M,O,P
253	Cols. K,M,O-R

PAGE NO.

LINE/COL. NO

Page 256-260	Cols. D,F,H
261,264-270	Cols. D,F,I
262,263	Cols. A,C,F,H,J
271	Col. D
272	Cols. D,F
273,274	Cols. D,F,I
275	Cols. A,C,F,H,I,K,M
276	Cols. A,C,F,I,J,L,M
277,278,280	Cols. A,C,F,H,I,K,L
279	Cols. A,C,F,H,I.
281	Cols. A,B,D,E
282	Cols. A,E,F
285-292	Cols. 1995-1997, Lines 9-14,22-27
293	Cols. 1995-1997, Lines 9-14
294	Cols. 1995-1997, Lines 31-58
296,297	Cols. 1994-2003
298	Col. B (1995-1997)
300	Cols. B-D
307	Cols. A,B
314	Lines 12-14,23-25,34-36,40-43
317	Cols. A-C
329-332	Cols. 1989-1994
333-339	Cols. 1989-1993
340-343	Cols. 1993-2003
344-346	Cols 1991-2002

Item no. 5

Page 384-385	Cols. A-C
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Exhibit 3 (TELRIC)

Page 31	Col. A, Lines 9,11,13,15,18 (marginalia); Lines 25,28,31,34
32	Lines 5,8
36-41	Cols. Unit Inv/Totalinv

Attachment A
Dockets 960833/846/916-TP
Late Filed Deposition Exhibits
D. Caldwell 9/27 and 10/7/96
Page 4
10/25/96

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>
Page 43	Line 11
46-48	Cols. D,F,H
57,59,61	Cols. C,D, Lines 3,5,7,9
58,60,62	Cols. A,B,D-G
71	Cols. D-I
142	Col. 1996 Florida, Lines 4,5,7,8
143-145	Col. D
146	Col. B-D
147-152	Cols. 1995-1998
153-155	Cols. 1996-1998
157	Lines 4,5
158	Cols. F-K
159-181	Col. Amount
182	Cols. D-I
183-185	Cols. B-L
205	Cols. 1996-1998
206	Col. Current Cost
221	Cols. Level Invst, Annual Weighted Direct Cost
222	Lines 8,24
226	Col. Florida, Lines 1,2,4-7
227	Cols. A-F
228,229	Cols. C,E,F,H,L
230	Lines 4-15
232	Cols. C-E
233,234,238-251	Cols. C-E,G-I
235,236	Cols. K,M,P,R,S
237	Cols. G,I,K,M,O,P
252,256,257	Cols. C-E,G
253-255	Cols. D,E,G
258,259	Cols. C,G
260,261	Cols. D,G
262,263	Cols. D,E,G
264	Cols. B,C,F,G,J,K
265-269	Cols. E,F,H-J
272-285	Lines 9-14,22-27
286	Lines 9-14

Attachment A
Dockets 960833/846/916-TP
Late Filed Deposition Exhibits
D. Caldwell 9/27 and 10/7/96
Page 5
10/25/96

PAGE NO.

LINE/COL. NO.

Page 287	Lines 31-57
290,291	Cols. 1994-2004
292,309	Cols. 1996-1998
294	Cols. B-D
310	Cols. Power&Common, Power Only
311	Col. Current Cost
316	Cols. 1996-1998
318	Lines 11-13,22-24,33-35,39-42
321,338	All Columns
333-337	Cols. 1988-1/95
339-340	Cols. 1994-2004
341,342	Cols. 1994-2003
343-346	All Columns