

NANCY B. WHITE
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ORIGINAL
FILE COPY

November 5, 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. 961150-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 (as)
Nancy B. White

ACK _____
AFA _____
APP _____ Enclosures
CAF _____ cc: All Parties of Record
CMU _____ A. M. Lombardo
CTR _____ R. G. Beatty
EAG _____ W. J. Ellenberg
LEG _____
LIN _____
OPC _____

RCH _____
SEC 1 Redacted DOCUMENT NUMBER-DATE
WAS _____ 11849 NOV-5 8
OTH all-Mailed FPSC-RECORDS/REPORTING

Confidential
DOCUMENT NUMBER-DATE
11848 NOV-5 8
FPSC-RECORDS/REPORTING

Request
DOCUMENT NUMBER-DATE
11847 NOV-5 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Sprint
Communications Company)
L.P. for Arbitration of)
Interconnection with BellSouth)
Telecommunications, Inc.)
Under the Telecommunications)
Act of 1996)

Docket No.: 961150-TP

Filed: November 5, 1996

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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 Exhibits to the direct testimony of Daonne Caldwell filed on October 15, 1996 in Docket 961150-TP.

1. BellSouth is filing its Request for Confidential Classification for the Caldwell Exhibits because it deems the information requested to be confidential and proprietary business information in that it reflects cost studies of various unbundled elements, such as loops and ports. 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.

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 exhibit with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the exhibit with the material which is confidential and

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding Caldwell's Exhibits, this information is entitled to proprietary confidential classification for the following reasons. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in Caldwell's Exhibits, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. 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

Exhibits to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 5th day of November, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

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CERTIFICATE OF SERVICE
DOCKET NO. 961150-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 5th day of November, 1996 to the following:

Benjamin W. Fincher
3100 Cumberland Circle, #802
Atlanta, Georgia 30339
(404) 649-5144

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Commission
Division of Legal Services
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Nancy B. White
12/5/96

ATTACHMENT A
Request for Confidential Classification
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ATTACHMENT A

FPSC DOCKET 961150-TP

EXHIBITS FILED WITH DIRECT TESTIMONY OF D. CALDWELL
FILED 10/15/96

Explanation of Proprietary Information

This information reflects cost information and vendor-specific competitive information which reflects BellSouth's 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 in that they would know the price or rate below which BellSouth could not provide the service. 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, 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.

Direct Access to Directory Assistance Service

Workpaper 2, Page 1&2
Workpaper 3, Page 1
Page 2

Line 13
Lines 10-14, 24-27, 29-32, 53,54
Lines 10,12, 21-23, 25-27, 46

Unbundled Loops

Tab D
Tab D, Page 2
Tab E, Page 1
Page 2

Col. In-plant Factor; Lines 25, 28,
31, 34
Lines 5, 8
Cols. Unit Inv/Totalinv; Lines 2-6,
8-12, 14-18, 20-24, 26-30, 32-36, 38-41
Cols. Unit Inv/Totalinv; Lines 1, 3-7,9-13,
15-19, 21-25, 27-31, 33-37, 39-41

Attachment A
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of D. Caldwell
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LINE/COL. NO.

Tab E, Page 3	Cols. Unit Inv/Totalinv; Lines 1, 2, 4-8, 10-14, 16-20, 22-26, 28-32, 34-38, 40, 41
Page 4	Cols. Unit Inv/Totalinv; Lines 1-3, 5-9, 11-15, 17-21, 23-27, 29-33, 35-39, 41
Page 5	Cols. Unit Inv/Totalinv; Lines 1-15, 20-24, 26-30, 32-36, 38, 39
Page 6	Cols. Unit Inv/Totalinv; Lines 1-3, 5-8
Tab F	Line 11
Tab G, Page 2, 4	Cols. D, F, H; Lines 108-144, 147
Page 3	Cols. D, F, H; Lines 12-48, 51
Section 7	
Input Table, Page 1	All % Columns

Unbundled 4-Wire DS1 Digital Grade Loop

Workpaper 100	Col. B, Lines 1-10
101-105	Lines 13-38, 41-43
101A-105A	Lines 13-38, 41-43
3100-3300, Page 1	Col. Levelized Utilized Investment
3100, Page 2	Cols. A, C, Investments
3200, Page 2	Cols. A, B, C, E, G, Investments
3300, 3400, Page 2	Cols. A, B, C, E, G
3400, Page 1	Col. A, Lines 1-22; Col. B
3400, Page 3	Cols. A, C, Investments
3401, 3501	Cols. A, C
3500, Page 1	Cols. A, B
Page 2, 3	Cols. A, B, C, E, G
30100	Cols. A, C, E, G, I
30200	Cols. A-C, E, G-H, K, M, N, P, T, V

Unbundled Exchange Ports

Section 4A	
Workpaper 20	Col. Amount, Lines 3-5, 8-10, 13-15, 18-20
21	Col. Amount, Lines 3-5, 12-14, 18-20, 27-29, 37-39

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PAGE NO.

LINE/COL. NO.

Workpaper 22

Col. Source, Lines 2, 5; Col. Amount,
Lines 2, 5, 8, 14-16, 22

23

Col. Source, Lines 2, 4-6, 10, 12;

Col. Amount, Lines 2, 4-7, 10, 12, 13, 16,
23-32, 39

24

Col. Amount, Lines 2, 3, 17, 18

34

Col. Source, Lines 3, 19, 20; Col. Amount,
Lines 2, 3, 19, 20

Section 4B

Workpaper 20

Col. Amount, Lines 2, 3

21

Col. Amount, Lines 2, 9-11, 14, 21-23,
31-33

22, Page 1

Col. Amount

Page 2

Col. Amount, Lines 49-51, 63, 64, 68,
71, 72, 77, 79, 81

Page 3

Col. Amount, Lines 92, 93

Section 4C

Workpaper 20

Col. Amount, Lines 3, 4, 8, 9, 15, 16

21

Col. Amount, Lines 2, 3, 16, 17

22

Col. Amount, Lines 3-5, 12, 13, 16-18, 25,
26, 30, 31

23

Col. Source, Lines 2, 4; Col. Amount,
Lines 2, 4, 6, 19, 31-33

24

Col. Source, Lines 2, 4, 7, 8; Col. Amount,
Lines 2, 4, 7, 8, 10, 14, 26-31

33

Col. Source, Lines 11, 27, 28; Col. Amount,
Lines 2, 6, 9, 11

Section 4D

Workpaper 20

Col. Amount, Lines 2, 3, 7, 8, 13, 14

21

Col. Amount, Lines 2, 3, 16, 17

22

Col. Amount, Lines 1, 8, 9

23

Col. Source, Lines 2, 4; Col. Amount,
Lines 2, 4, 6, 19, 31-33

24

Col. Source, Lines 2, 4, 7, 8; Col. Amount,
Lines 2, 4, 7, 8, 10, 14, 26-31

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PAGE NO.

LINE/COL. NO.

Section 4D
Workpaper 33

Col. Source, Line 11; Col. Amount,
Lines 2, 6, 9, 11; Lines 29, 30

Section 4E
Workpaper 20

Col. Amount, Lines 2, 3, 7, 8, 12, 13
Col. Amount, Lines 3-6, 13-15, 19-22,
29-31, 39, 40

21

Col. Amount, Lines 1, 10, 11

22

Col. Source, Line 37; Col. Amount,
Lines 3-7, 10, 12, 16-18, 21, 22, 36, 37

33

Section 4F
Workpaper 20

Col. Amount, Lines 3-6, 13-15, 20-24,
31-33, 41, 42

21

Col. Source, Lines 2, 3; Col. Amount,
Lines 2-4

22

Col. Source, Lines 3, 5, 7; Col. Amount,
Lines 3, 5, 7, 9, 17-19, 22-26

23

Col. Source, Lines 3, 5, 7; Col. Amount,
Lines 3, 5, 7, 9, 18, 19, 22-27

33

Col. Source, Line 3; Col. Amount, Lines 1, 3

Unbundled Loop Channelization

Section 4
Workpaper 100

Col. C, D

200, Page 1

Cols. C, E-M, Lines 2, 6, 8, 10

Page 2, 4

Cols. C, E-M

Page 3

Cols. C, E-M, Lines 2, 4, 6, 8, 10

300, Page 1

Col. Result, Lines 2, 3, 6, 9, 10, 17-20,
23, 26, 29, 30, 33, 36

Page 2

Col. Result, Lines 2, 5, 11, 14, 17, 20,
23, 24, 27, 30

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PAGE NO.

LINE/COL. NO.

Special Access Voice Grade

Section 4

Workpaper 100

ACE Report 20, Pages 1-6
10, Pages 1-6

Workpaper 200

201, Page 1

Page 2

202

300

301

Cols. A, B; Col C, Lines 6-24, 34-57

Cols. C, K-Q; Lines 15, 18

Cols. Capital Investment; Line Initial Total
Investment, Adjusted Total Investment

Cols. C-E, Lines 4, 5, 9, 11, 13, 15, 21,
23-25, 29, 30, 34, 36, 38, 40, 46, 48, 50

Col. C, Lines 3, 4, 10,12, 30, 32-34

Cols. C-E, Lines 4, 5, 15, 17, 31, 33, 35

Cols. C-E, Lines 3, 4, 8, 10, 20, 22-24, 30,
35, 37, 47, 49, 51

Col. C, Lines 2, 4, 6, 8, 10, 12, 14, 16, 18,
20, 22, 25, 27, 30, 32, 35, 37-40

Col. C, Lines 2, 4, 6, 8, 10, 12,14, 16, 18,
20,22,24,26,28, 30,33, 35, 38, 40, 43, 45-48

Operator Call Processing Access

Workpaper 1, Pages 2-5

2, Pages 1-4

4, Page 1

2

5

7, Page 1

2

All Columns except Unit Cost

Col. AWT/FWS 6/96

Col. A, Lines 9, 12, 13, 15, 16, 26-28

Col. A, Lines 15, 20, 26-28

Cols. A, B, Lines 8, 11-13

Col. Annual Cost, Lines 28, 29, 34, 35, 38

Col. Annual Cost, Lines 28, 29, 34, 35

Inward Operator Services Access Service

Workpaper 2, Pages 1,2

4, Page 1

2

5

Col. AWT, Lines 11,17

Col. A, Lines 10, 13, 14, 16, 17, 20, 27-31

Col. A, Lines 15, 20, 27-31

Lines 9, 13-15

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PAGE NO.

LINE/COL. NO.

Emergency Call Trace

Section 4
Workpaper 1

Cols. A-C, Lines 1, 5, 7

Section 5
Workpaper 2

Cols. A-D

Directory Assistance Access

Section 4
Workpaper 2, Pages 1,2
4, Page 1
2
5
6, Page 1
2

Col. Amount, Line 1
Col. Amount, Lines 2, 5, 6, 8, 11, 18-22
Col. Amount, Lines 4, 11, 18-22
Col. Amount, Lines 2, 5
Col. A, Lines 2, 3, 5-8, 18-21, 23-26, 47
Col. A, Lines 2, 5, 6, 18-20, 23-25, 47

Directory Assistance Database

Section 4
Workpaper 2
Section 5

Col. A, Lines 27, 36; Col. D, Lines 28, 37
Line 6

DACC Access Service

Section 4
Workpaper 1
2
3
Section 5
Workpaper 4

Cols. C,D; Col. E, Lines 1, 3
Cols. C-E, Lines 3, 5-7, 9, 13, 15,
19, 21, 24, 29, 31, 34, 36
Cols. C-E, Lines 4-6, 10, 12, 14
Cols. C, D

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PAGE NO.

LINE/COL. NO.

Directory Transport

Section 4

Workpaper 1

2

Cols. C, D

Cols. C, D; Col. E, Lines 1, 3, 5, 8, 10

Number Services Intercept Access

Section 4

Workpaper 1

2

Cols. C, D; Col. E, Lines 1-3

Cols. C-E, Lines 3, 5-7, 9, 13, 15, 19,
21, 24, 28, 30, 32, 35

3

Cols. C-E

4, 5

Cols. C-E, Lines 3, 5, 9, 13, 15, 19, 21, 22,
24, 29, 32

6, 7

Cols. A, B, E-G

8

Cols. A, E-G; Cols. C-E

CCS7 Signaling Transport

Section 4

Workpaper 3, Page 1

Col. Source, Lines 10, 17, 23; Col. Amount,
Lines 9-11, 13, 16-18, 20, 22-24, 26, 27

4, Page 3, 4

Col. Source, Lines 16, 17, 27; Col. Amount,
Lines 12-17, 20-24, 26-28, 30, 31

Workpaper 5, Page 1

Col. Source, Lines 10, 17, 23; Col. Amount,
Lines 9-11, 13, 16-18, 20, 22-24, 26, 27

Unbundled Local Usage

Section 4

Workpaper 100, Page 1

Cols. B-J

2

Cols. C-E, Lines 1-4

3

Cols. B-N

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Unbundled Local Usage

Section 4

TELRIC

Workpaper 200, Page 1
2
3
4

Cols. C-E
Cols. C-I
Cols. C-G
Lines 2, 4

Direct Cost

Workpaper 200, Page 1
2
3
4

Cols. C-E
Cols. C-I
Cols. C-G
Lines 2, 4

Section 6, Page 19
20

Lines 3A, 6, 7
Line 15A