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30 MAY 18 PM 4: 27

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RECORDS AND
REPORTING

May 18, 1999

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

**Re: Docket Nos. 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL and 981250-TL**

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Revised Attachment "A" to Request for Confidential Classification filed on April 30, 1999. Please file this document in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,

Nancy B. White
(NW)
Nancy B. White

AFA _____
APP _____
GAF _____
CMU _____
CTR _____
EAG _____
LEG _____
MAG _____
OPC _____
RPR _____
SEC _____
WAW _____
OTH _____

Enclosures

cc: All parties of record
M. M. Criser, III
J. Phillip Carver
William J. Ellenberg II (w/o enclosures)

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PPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

06277 MAY 18 99

PPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL
981012-TL, and 981250-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 18th day of May, 1999 to the following:

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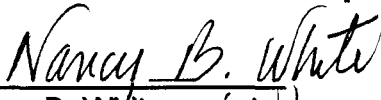
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Nancy B. White (BW)

ORIGINAL

REVISED ATTACHMENT A
BellSouth Telecommunications, Inc.
FPSC Dockets 980946-TL, 980947-TL,
980948-TL, 981011-TL, 981012-TL,
and 981250-TL
Direct Testimony of R. K. Young, K. L.
Welch, R.W. Beasley, and M.D. West
Request for Confidential Classification
Page 1
May 17, 1999

REVISION TO ATTACHMENT A FILED ON APRIL 30, 1999
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SPECIFIC DATA FILED AS
ATTACHMENTS TO THE DIRECT TESTIMONY OF
RUTH K. YOUNG, KATHY L. WELCH, RONALD W. BEASLEY, AND MICHAEL D. WEST
ON APRIL 9, 1999 AS NOTED IN THE CHART ON PAGE 2
DOCKETS 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL, AND 981250-TL

Explanation of Proprietary Information

1. This information constitutes trade secrets that relate to the competitive business of BellSouth. The release of this information would potentially damage BellSouth in that it would allow BellSouth's competitors to have free access to intellectual property, which was developed at significant expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as market research and market development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(a) and (e).
2. This information includes the floor plans of BellSouth central offices. These plans are proprietary and confidential business information. These offices have limited access and are the central focal point of telecommunications in their geographic location. Public disclosure of this information would impair BellSouth's ability to keep these offices and the communications network secure. This information is valuable, BellSouth uses it in conducting its business and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (c), Florida Statutes.
3. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis; names of individuals assigned to certain projects; key details relating to the substance of such projects as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive responses. BellSouth's competitors could use this information to develop their own market strategy with which to thwart BellSouth's effort in the market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete. In addition, this information is valuable as BellSouth uses it in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret, which should be, classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e).
4. This information contains customer specific information that is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.

DOCUMENT NUMBER-DATE

06277 MAY 18 89

FPSC-RECORDS/REPORTING

REVISED ATTACHMENT A
BellSouth Telecommunications, Inc.
FPSC Dockets 980946-TL, 980947-TL,
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DOCKETS 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL, AND 981250-TL

DIRECT TESTIMONY OF	PAGE NUMBER	LINE NO., ITEM NO. OR COLUMN NO.	BELLSOUTH DOCUMENT IDENTIFICATION	PROPRIETARY REASON
RUTH YOUNG	RKY-2 pp. 18 – 19	14, 15, 17, 18	Miami Palmetto Floor Plan	2, 4
	RKY-4 p. 2	4	Memorandum	4
	RKY-4 p. 4	6	Memorandum	4
	RKY-4 pp. 38 –72	Entire Document	Capacity Management Collocation Guidelines	1, 3
	RKY-4 pp. 73 - 76	Entire Document	Engineering and Installation Standards – Central Office	1, 3
	RKY-4 p. 78	Entire Document	Miami Palmetto Floor Plan	2, 4
KATHY L. WELCH	KLW-4 p. 4	Entire Document	Boca Teeca Floor Plan Docket No. 980947-TL Document No. 03842-99 Workpaper 16-1, pp. 1 – 2	2
	KLW-4	Entire Document	North Dade Golden Glades Floor Plan Docket No. 981012-TL Document No. 03846-99 Workpaper 16, pp. 1 – 2	2
RONALD W. BEASLEY	RB-1	A, B, C, D	Miami Palmetto Floor Plan	2, 4
MICHAEL D. WEST	Exhibits (CD Rom)	A, B, D, E	Miami Palmetto Floor Plans PalmettoDiagram1.jpg PalmettoDiagram2.jpg PalmettoDiagram3.jpg	2, 4

ENTIRE DOCUMENT IS PROPRIETARY

KLW-4 (Page 4)

Document No. 03842-99 (Docket No. 980947)

Audit Item 16-1, p. 1 – floor plan

Audit Item 16-1, p. 2 – floor plan

ENTIRE DOCUMENT IS PROPRIETARY

KLW-4 (Page 6)

Document No. 03846-99 (Docket No. 981012)

Audit Item 16, p. 1 – floor plan

Audit Item 16, p. 2 – floor plan