

R. DOUGLAS LACKEY
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BellSouth Telecommunications, Inc.
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January 3, 2001

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

Re: Docket No. 000731-TP (AT&T Arbitration)

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of the BellSouth Telecommunications, Inc. Request for Confidential Classification of response to AT&T Communications of the Southern States, Inc. Request for Production of Documents Item No. 19, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,


R. Douglas Lackey

cc: All Parties of Record
Marshall M. Criser III
Nancy B. White

DOCUMENT NUMBER-DATE

00114 JAN-30

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 000731-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via hand delivery or Overnight Mail this 3rd day of January, 2001 to the following:

Lee Fordham
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Marsha Rule
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6365
Fax. No. (850) 425-6361

Virginia Tate
AT&T Communications of the Southern
States, Inc.
1200 Peachtree Street, N.W.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-4922


R. Douglas Lackey

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
)
Petition by AT&T Communications of the) Docket No.: 000731-TP
Southern States, Inc. for arbitration of)
Certain terms and conditions of a proposed)
Agreement with BellSouth Telecommunications,)
Inc. pursuant to 47 U.S.C. Section 252) Filed: January 3, 001
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states the following:

1. On November 13, 2000, AT&T Communications of the Southern States, Inc (AT&T) filed their First Request for Production of Documents and First Set of Interrogatories to BellSouth Telecommunications, Inc. (BellSouth). On December 13, 2000, in response to AT&T's Request, BellSouth filed its responses, some of which contains proprietary, confidential information. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification, indicating it intent to ask for confidential classification of information responsive to Request for Production of Documents Item No. 19 and Interrogatory Number 37.

2. BellSouth hereby withdraws its Notice of Intent to Request Confidential Classification for the response to Interrogatory Number 37.

3. BellSouth hereby files this Request for Confidential Classification of response to Request for Production of Documents Item No. 19. The information contained in the specific document furnished by BellSouth in response to this request

includes confidential business information. Attachment "A" to BellSouth's Request for Confidential Classification contains the specific justification for the request for confidential classification along with a list that identifies the location of the information designated by BellSouth as confidential.

4. Attachment "B" to BellSouth's Request for Confidential Classification contains two copies of the document with the confidential information redacted.

5. Attachment "C" to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the document including those portions that are confidential and proprietary.

6. The information contained in BellSouth's response to AT&T's request includes confidential business information that is considered proprietary to BellSouth. Therefore, such information should continue to be classified as confidential business information pursuant to Section 364.24 and Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

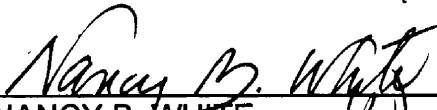
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

8. The original of this Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 3rd day of January, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (bw)

JAMES MEZA III
c/o Nancy Sims
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(305) 347-5558



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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 1 of 2
1/3/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 19) FILED DECEMBER 13, 2000 IN FLORIDA DOCKET NO. 000731-TP

Explanation of Proprietary Information

This request was for documents that relate to BellSouth's internal change control processes. BellSouth does not have a stand-alone document that is responsive, but submitted a document that relates to software configuration management procedures for a BellSouth project that incorporates information about BellSouth's internal change control process. The overall document itself lays out the principles, processes and tasks of software configuration management as it relates to one of BellSouth's internal projects related to the modernization of BellSouth's software systems. This information constitutes strategic planning and development information related to the software and technology that BellSouth uses in its internal operations. This information is treated as proprietary and confidential business information by BellSouth. Public disclosure of this information would provide BellSouth's competitors with a description of processes and principles associated with software configuration management that is valuable. This same information on competitors is not available to BellSouth. This information 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 for the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 2 of 2
1/3/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 19)
FILED DECEMBER 13, 2000 IN FLORIDA DOCKET NO. 000731-TP**

POD No. 19

Page No.

Reason

Entire Document

1