

R. DOUGLAS LACKEY
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0747

January 10, 2001

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

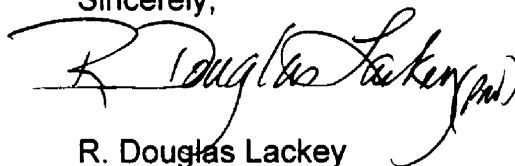
Re: Docket No. 000731-TP (AT&T Arbitration)

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 Nos. 21, 22 and 24, 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

00455 JAN 10 01

FPSC-RECORDS/REPORTING

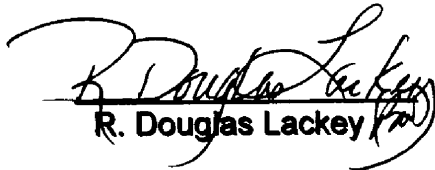
**CERTIFICATE OF SERVICE
Docket No. 000731-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via hand delivery or Overnight Mail this 10th 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

Petition by AT&T Communications of the)
Southern States, Inc. for arbitration of) Docket No.: 000731-TP
Certain terms and conditions of a proposed)
Agreement with BellSouth)
Telecommunications, Inc. pursuant to)
47 U.S.C. Section 252.) Filed: January 10, 2001
_____)

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 22, 2000, AT&T Communications of the Southern States, Inc (AT&T) filed its Third Request for Production of Documents to BellSouth Telecommunications, Inc. (BellSouth). On December 21, 2000, BellSouth filed its responses, some of which contain proprietary, confidential information. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification for that material.

2. BellSouth hereby files this Request for Confidential Classification of information responsive to Request for Production of Documents Item Nos. 21, 22 and 24, because the information contained in these documents include 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 listing of the locations where the information designated by BellSouth as confidential is located within the documents in question.

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

4. Attachment "C" to BellSouth's Request for Confidential Classification is a sealed envelope containing one complete copy of the documents with the portions that are confidential and proprietary highlighted.

5. 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.

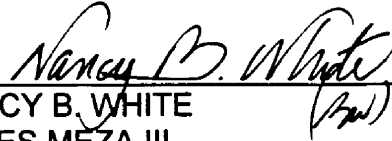
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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

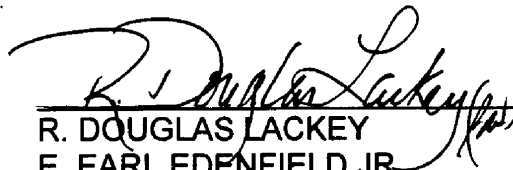
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 10th day of January, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
JAMES MEZA III
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



R. DOUGLAS LACKEY
E. EARL EDENFIELD JR.
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0763

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 1 of 2
1/10/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO AT&T'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 21, 22 and 24) FILED DECEMBER 21, 2000 IN FLORIDA DOCKET NO. 000731-TP

Explanation of Proprietary Information

1. The information requested contains BellSouth intellectual property in the form of a Requirements Document. The system described in the document was designed for internal BellSouth use with its own retail customers, and contains system design and programming requirements. Disclosure to the public would allow competitors (ALECs) or third-party vendors to develop similar systems, taking advantage of BellSouth's investment for design and development, without any form of compensation to BellSouth.

It may be appropriate for BellSouth in the future to make available to ALECs, access to the system capabilities described in the document. In such a case, BellSouth would provide at that time a separate User's Document for ALEC use. Until that decision is made, however, BellSouth is entitled to proprietary treatment of this internal systems requirements document.

2. The information requested contains BellSouth intellectual property in several forms. The overall AIN SCR solution has been submitted to the United States Patent and Trademark Office (USPTO) as something that may be granted a patent. Until the patent has been granted or denied, BellSouth is entitled to protect its interest by have the material treated as proprietary. The billing and provisioning methods and procedures address by the information have been developed by BellSouth for internal use, and should be considered trade secrets. Disclosure to the public of either of these forms of intellectual property would diminish the value of the intellectual property, and would allow competitors (ALECs) or third-party vendors to develop similar systems, taking advantage of BellSouth's investment for design and development, without any form of compensation to BellSouth.

BellSouth may, in the future, make available to ALECs access to the system capabilities described in the document, but in such instance BellSouth would provide separate interface specifications and usage documents for the ALEC's use. Until that decision is made, however, BellSouth is entitled to proprietary treatment of this information that has been developed for BellSouth's own internal use.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 1 of 2
1/10/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 21,
22 and 24) FILED DECEMBER 21, 2000 IN FLORIDA DOCKET NO. 000731-TP**

POD No. 21

<u>Page No.</u>	<u>Reason</u>
Entire Document	1

POD No. 22

<u>Page No.</u>	<u>Reason</u>
Entire Document	1

POD No. 24

<u>Page No.</u>	<u>Reason</u>
Entire Document	2