

R. DOUGLAS LACKEY
General Attorney

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

February 2, 2001

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

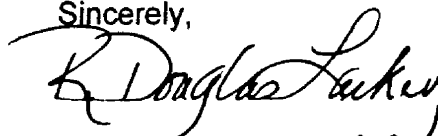
Re: Docket No. 000731-TP (AT&T Arbitration)

Dear Ms. Bayó:

Enclosed please find an original and fifteen copies of the BellSouth Telecommunications, Inc. Request for Confidential Classification of response to Staff's First Request for Production of Documents Item Nos. 2, 3 and 4 and Staff's Second Request for Production of Documents Item Nos. 8, 14, 15, 17, 18, 19, 20, 26, 27, 28, and 31, 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 (att)

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

DOCUMENT NUMBER-DATE

01553 FEB-20

FPSC-RECORDS/REPORTING

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

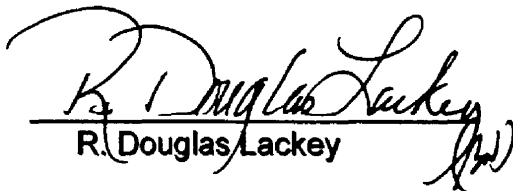
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(* Electronic Mail and Federal Express this 2nd day of February, 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 (*)
Karen Jusevitch (*)
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
mrule@att.com
kjusevit@att.com

Roxanne Douglas (*)
AT&T Communications of the Southern
States, Inc.
1200 Peachtree Street, N.W.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-8670
Fax. No. (404)
rxdouglas@att.com


R. Douglas Lackey

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
) Docket No.: 000731-TP
Petition by AT&T Communications of the)
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: February 2, 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 January 12, 2001, BellSouth Telecommunications, Inc. filed its responses to the Florida Public Service Commission's First Request for Production of Documents and Second Request for Production of Documents. Some of the information contained in documents responsive to Staff's First Request for Production Nos. 2, 3 and 4 and in documents responsive to Staff's Second Request for Production Nos. 8, 14, 15, 17, 18, 19, 20, 26, 27, 28 and 31 contains confidential business information that is considered proprietary to BellSouth. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification, indicating its intent to ask for confidential classification of information responsive to these requests.

2. BellSouth filed, but hereby withdraws its Notice of Intent to Request Confidential Classification for the response to Staff's Second Request for Production No. 16, and substitutes in lieu thereof, BellSouth's response to Staff's Second Request for Production No. 19, which should have been listed in the Notice of Intent.

3. BellSouth hereby files this Request for Confidential Classification of the proprietary information provided in response to the above referenced requests. The information contained in these documents furnished by BellSouth includes among other things, 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 Staff's requests include 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.

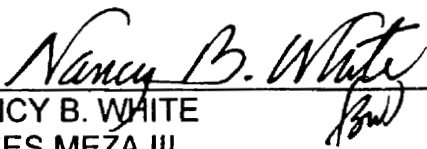
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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

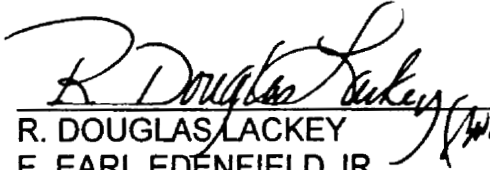
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 2nd day of February, 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 12
2/2/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

Explanation of Proprietary Information

1. This information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
2. This information reflects BellSouth's cost to provide certain services. The 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, therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. In addition, 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 364.183, Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 2 of 12
2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

Explanation of Proprietary Information

3. The information requested contains practices/procedures utilized by BellSouth for conducting internal business transactions associated with some of BellSouth's Operations Support Systems and operating centers. This information if released would allow BellSouth's competitors to have free access to certain intellectual property which was developed at significant expense to BellSouth. BellSouth's competitors can use this information to develop their own strategies without the burden and expense of developing this property for themselves. Thus the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and the information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business which BellSouth strives to keep as trade secrets. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 3 of 12
2/2/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

Staff's 1st POD

POD No. 2

<u>Page No.</u>	<u>Reason</u>
Entire Document	3

POD No. 3

<u>Page No.</u>	<u>Reason</u>
Entire Document	3

POD No. 4

<u>Page No.</u>	<u>Reason</u>
Entire Document	3

ATTACHMENT A

BellSouth Telecommunications, Inc.
 FPSC Docket No. 000731-TP
 Request for Confidential Classification
 Page 4 of 12
 2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

Staff's 2nd POD

POD No. 8

Attachment No. 1

Page	Column:	Lines:	Reason:
Page No. 1	1998 Material Price per Housing		1
	1998 Material Price		1
	1998 Material Price per Bay		1
	Probability of Occurrence		
	Weighted Material		1
Page 2	Unit Price, Eqpt Total, Total Inst. Material, Total Inst. Labor		1
Page 3	Unit Price, Eqpt. Total, Total Inst. Material, Total Inst. Labor		1
Page 4	Unit Price, Eqpt. Total, Total Inst. Material, Total Inst. Labor		1
Page 5	Entire page		1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 5 of 12
2/2/01

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
 TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS.
 2,3 AND 4) AND BELL SOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR
 PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND
 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP**

Page 6	Entire page		1
Page 7	Entire page		1
Page 8	Entire page		1
Page 9	Entire page		1
Page 10	Entire page		1
Page 11	Entire page		1
Page 12	Entire page		1

ITEM: POD No. 14

Attachment No. 1

PAGE	COLUMN:	LINES	REASON
Page 1	Percent of job	entire column	1, 2
	Subtotal Cost	entire column except total	1, 2
	Cost per sq ft.	entire column except total	1, 2
	Unit Cost		1, 2
	Subtotal Cost		1, 2
	Total Cost		1, 2
Page 2	25: Qty, Unit Cost, Total		1, 2
	50: Qty, Unit Cost, Total		1, 2
	100: Qty, Unit Cost, Total		1, 2
	150: Qty, Unit Cost, Total		1, 2

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 6 of 12
2/2/01

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
 TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS.
 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR
 PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND
 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP**

Page 2	200: Qty, Unit Cost, Total		1, 2
Page 3		Welded Wire Mesh Enclosure cost	1, 2
		Swinging Door cost	1, 2
		Dust Protection cost	1, 2
		Electrical Work cost	1, 2
		Electrical Grounding cost	1, 2
		Signage cost	1, 2
		General Condition cost	1, 2
		Contractor's fee	1, 2
		Architectural/Engin eer ing Fee	1, 2
		Project Mgmt. fee	1, 2

POD No. 15
 Attachment No. 1

Page Number	Column:	Lines:	Reason
Page 1	Cost	Entire column	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
 FPSC Docket No. 000731-TP
 Request for Confidential Classification
 Page 7 of 12
 2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELL SOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

POD No. 17
 Attachment No. 1
 Page Number

Page Number	Column:	Lines	Reason:
Page 1	Cost		1
	Card Access Software	All cost shown	1

POD No. 18
 Attachment No. 1

Page 1	First paragraph	8 th word in first line	1
		4 th , 5 th , 6 th words in 3 rd line	1
		10 th , 11 th 12 th words in 4 th line	1
Page 2	Active Cards	Entire column	1
	Second Column	Entire column	1

POD No. 19
 Attachment No. 1

Page	Column	Lines	Reason
2, 3, 4, & 5	Total Cost Design	Entire Column	2
	Total Cost Constr	Entire Column	2
	Asbestos Costs	Entire Column	2
	Total Cost	Entire Column	2
	Adjusted Total Cost	Entire Column	2
	Adjusted Cost per Sq Ft	Entire Column	2

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 8 of 12
2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

POD No. 20
Attachment No. 1

Page	Column	Lines	Reason
Page 1	First Unit, Minor Matl	Entire Column	1
	Subsequent Units, Minor Matl	Entire Column	1

POD No. 26
Attachment No. 1

Page	Column:	Lines	Reason
Page 1	Lucent Product ID:		1
	Computation	Bottom line, handwritten	1
Page 2	Engineering: First, Ea Add	Entire column	1
	Installation: First, Ea. Add	Entire column	1
	Matl: Each	Entire column	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
 FPSC Docket No. 000731-TP
 Request for Confidential Classification
 Page 9 of 12
 2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

POD No. 27
 Attachment No. 1

Page 1	First		1
	Ea. Add.		1
	Total		1
	First		1
	Ea. Add.		1
	Total		1
	Each		1
	Total		1
		Totals: Eng:	1
		Totals: Inst:	1
		Totals: Mat:	1
		Grand Total	1
	Est. Cost of extra cabling if cosmic frame is involved; max distance 150:	Lines for: First, Ea. Add, Total, First, Ea. Add, Total, Each, Total	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 10 of 12
2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELLSOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

POD No. 28
 Attachment No. 1

Page 1	Amount:	10, 12, 22, 24, 36, 38, 48, 50	1
Page 2	Description: 96-line CO Splitter Shelf (current)	Cost	1
	Description: 96-line CO Splitter Shelf (w/test access)	Cost	1
	4-line Card (current)	Cost	1
	4-line Card (w/test access pt's)	Cost	1
	Empty CO Splitter Shelf (current)	Cost	1
Page 3	Bantam Jack Test Shelf (current)	Cost	1
	24-line RT Splitter shelf (rear access)	Cost	1
	24-line RT Splitter shelf (front access)	Cost	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 11 of 12
2/2/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 2,3 AND 4) AND BELL SOUTH'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 8,14,15,17,18, 19, 20, 26, 27, 28 AND 31) FILED JANUARY 12, 2001 IN FLORIDA DOCKET NO. 000731-TP

POD No. 31
Attachment No. 1

Page 1	Telcordia Capital		1
	Telcordia Expensed Services		1
	Telcordia Annual Software Maintenance		1
	Telcordia Total Contract		1
Page 2	COG, Column C		1
	SOG, Column D		1
	DOM, Column E		1
	New Gateway, Column F		1
	2000 Column F		1
	2001 Column G		1
	2002 Column H		1
	Capital Contract Column F		1
	Capital Percentage, Column H		1
Page 3 & 4	Column 2000		1
	Column 2001		1
	Column 2002		1