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T. MICHAEL TWOMEY
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BellSouth Telecommunications, Inc.
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May 17, 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. 001797-TP (Covad Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for responses to Covad's First Request for Production of Documents (Nos. 7, 18, 22, 32, and 33), 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,

T. Michael Twomey
T. Michael Twomey (KA)

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

CERTIFICATE OF SERVICE
Docket No. 001797-TP

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

(*) Hand Delivery and Federal Express this 17th day of May, 2001 to the following:

Felicia Banks (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
fbanks@psc.state.fl.us

Covad Communications Company
Ms. Catherine F. Boone (+)
10 Glenlake Parkway
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Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
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Atty. for Covad

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James Meza III (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Interconnection Arbitration) Docket No. 001797-TP
By DIECA Communications, Inc. d/b/a)
Covad Communications Company Against)
BellSouth Telecommunications, Inc.)
_____) Filed: May 17, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

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

1. On April 26, 2001, BellSouth Telecommunications, Inc. filed its responses to Covad's First Request for Production of Documents. Included in its responses were documents containing vendor-specific information, cost information, confidential business information of BellSouth, and ALEC-specific data. Therefore, on that same day, BellSouth also filed its Notice of Intent to Request Confidential Classification.

2. BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in the responses is confidential and proprietary to BellSouth as it includes vendor-specific information, cost information, confidential business information of BellSouth,

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and ALEC-specific data. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary confidential business information.

3. A more specific description of this information is contained in Attachment A. This information is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Sections 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

4. 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.

5. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

6. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

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

Respectfully submitted this 17th day of May, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

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ATTACHMENT A

BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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5/17/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO COVAD'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 7, 18, 22, 32 AND 33) FILED APRIL 26, 2001 IN FLORIDA DOCKET NO. 001797-TP

Explanation of Proprietary Information

1. This information contains ALEC proprietary information that BellSouth is required to treat as proprietary and confidential business information.
2. The information requested contains practices/procedures utilized by BellSouth for provisioning line sharing – BellSouth Owned Splitter. 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.
3. 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.
4. 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.

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18, 22, 32 AND 33) FILED APRIL 26, 2001 IN FLORIDA DOCKET NO. 001797-TP**

POD No. 7

<u>Page No.</u>	<u>Line No/Column</u>	<u>Reason</u>
Pg 1	FL Resid Dispatch Col	1
	Res Non-Dispatch Col	1
	UNE Design Col	1
	UNE Des Non-Dis Col	1
	UNE Non-Des Disp Col	1
	Total Col	1
Pg 2	FL Res non-Dis Col	1
	UNE Des Disp Col	1
	UNE Des Non-Disp Col	1
	Total Col	1
Pg 3	UNE Des Disp Col	1
	UNE Des Non-Disp Col	1
	Total Col	1

POD No. 18

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

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POD No. 22

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
Pg 1	Line Nos. 1,4	1
	Total FLA Column	1
	NTF/TOK Column	1
	% Column	1
Pg 2	Line Nos. 2,3	1
	Res Disp Column	1
	Res Non-Disp Column	1
	UNE Des Dis Column	1
	UNE Des Non-Disp Column	1
	UNE Non-Des Disp Column	1
	Total Column	1
Pg 3	Line Nos. 2,3	1
	Res Non-Disp Column	1
	UNE Design Column	1
	UNE Des Non-Disp Column	1
	Total Column	1
Pg 4	Line Nos. 2,4	1
	UNE Des Disp Column	1
	UNE Des Non-Disp Column	1
	Total Column	1

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POD No. 32

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
Pg 2	Line Nos. 1-8	3 and 4
Pg 3	First Column	3 and 4
	Ea Add Column	3 and 4
	First Column	3 and 4
	EA Add Column	3 and 4
	Each Column	3 and 4
	Line No. 1	3 and 4
Pg 4	Engineering First, Ea. Add, Total Columns	3 and 4
	Installation First, Ea. Add, Total Columns	3 and 4
	Material Each, Total Col	3 and 4
	Total Eng Line	3 and 4
	Total Inst Line	3 and 4
	Total Mat Line	3 and 4
	Line No. 2	3 and 4
Pg 5	Line Nos. 1,2,3	3 and 4
Pg 6	Line Nos. 1,2,3	3 and 4

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POD No. 33

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
Pg 3	Cost Column	3 and 4
Pg 4	Bracket No. 1	3 and 4
Pg 5	Entire Page	3 and 4
Pg 6	Inputs Column	3 and 4
Pg 7	Columns C,F,G, L,M	3 and 4
Pg 8	Lines 217-219,222-226,228-231 234-236	3 and 4
Pg 9	Unit Price	3 and 4
Pg 10	1st Column	3 and 4
Pg 11	Columns F and G	3 and 4
Pg 12	Cost Column	3 and 4
Pg 13	use DS1 xcibb Column Bracket No. 1	3 and 4 3 and 4
Pg 14	Unit Price Column EQFT Total Column Total Inst Column Total Inst Labor Column	3 and 4 3 and 4 3 and 4 3 and 4
Pg 15	Unit Price Column EQFT Total Column Total Inst Column Total Inst Labor Column	3 and 4 3 and 4 3 and 4 3 and 4
Pg 16	Unit Price Column EQFT Total Column Total Inst Column Total Inst Labor Column	3 and 4 3 and 4 3 and 4 3 and 4

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POD NO. 33

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
Pg 17	Entire Page	3 and 4
Pg 18	Entire Page	3 and 4
Pg 20	Sub Price Column	3 and 4
	Marconi Total Price Col	3 and 4
	BellSouth Total Price Col	3 and 4
Pg 27	Minor Matl Col	3 and 4
	Avg Column	3 and 4
	Total Col	3 and 4
	Sq Ft Col	3 and 4
	Total Col	3 and 4
	Arrangement Column	3 and 4
Pg 31	Cost Column	3 and 4
Pg 32	FRC 460C Bracket	3 and 4
Pg 33	Bracket 1	3 and 4
	Cost Column	3 and 4
Pg 34	Column A	3 and 4
Pg 35	Computation Column	3 and 4
	Cost Column	3 and 4
Pg 36	Percent of Job Column	3 and 4
	Subtotal Cost Column	3 and 4
	Cost Per Sq Ft Column	3 and 4
	Unit Cost Column	3 and 4
	Subtotal Cost Column	3 and 4
	Total Cost Column	3 and 4

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POD NO. 33

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
Pg 37	Unit Cost Column	3 and 4
	Total Column	3 and 4
Pg 38	Unit Cost Column	3 and 4
	Total Column	3 and 4
Pg 39	Columns D,E,F and G	3 and 4
	Line Nos. 8,1516,24,39,46 and 61	3 and 4
Pg 40	Columns D,E,F and G	3 and 4
	Line Nos. 76 and 110	3 and 4
Pg 41	Columns F and G	3 and 4
Pg 42	Line Nos. 215-217, 219-223, 227,228	3 and 4