JAMES MEZA III Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561

July 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. 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 Covad's responses to Staff's Second Request for Production Nos. 27 and 30 (which contain confidential BellSouth information), 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,

James Meza III (KA)

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

> DOCUMENT NUMBER-DATE 08425 JUL 105 FP30-RECORDS/REPORTING

CERTIFICATE OF SERVICE Docket No. 001797-TP

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

Federal Express this 10th day of July, 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 Suite 650 Atlanta, GA 30328-3495 Tel. No. (678) 222--3469 Fax. No. (240) 525-5673 cboone@covad.com Atty. for Covad

Joseph A. McGlothlin (+) Vicki Gordon Kaufman (+) McWhirter Reeves McGlothlin Davidson Decker Kaufman Arnold & Steen, P.A. 117 South Gadsden Street Tallahassee, Florida 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-5606 Atty. for Covad Jmcglothlin@mac-law.com vkaufman@mac-law.com

AMU Mya II James Meza III (A)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Petition for Interconnection Arbitration By DIECA Communications, Inc. d/b/a Covad Communications Company Against BellSouth Telecommunications, Inc. Docket No. 001797-TP

Filed: July 10, 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 June 19, 2001, Covad Communications Company ("Covad") filed its Responses to the Staff of the Florida Public Service Commission's ("Staff's") Second Set of Interrogatories and Second Request for Production of Documents. Covad's responses to Request for Production of Documents Nos. 27 and 30 contained information that BellSouth considers to be confidential and proprietary. On that same day, Covad filed a Notice of Intent to Request Specified Confidential Classification for this information. BellSouth previously filed a Notice of Intent to Request Specified Confidential Classification and a Request for Specified Confidential Classification for this same information.

2. In an abundance of caution, pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in Covad's Responses to Staff's Second Set of Interrogatories and Second Request for Production of Documents

DOCUMENT NUMBER - DATE

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is information that BellSouth considers to be confidential and proprietary. Some of these responses includes, among other things, vendor-specific pricing information and confidential business information. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential business information. A more specific description of this information is contained in Attachment A. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

3. 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.

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

5. 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.

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Respectfully submitted this 10th day of July, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

White neur NANCY B. WHITE

JAMES MEZA III c/o Nancy Sims 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301 (305) 347-5558

R. DOUGLAS LACKEY T. MICHAEL TWOMEY 675 W. Peachtree Street Suite 4300 Atlanta, Georgia 30375 (404) 335-0747

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ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 1 of 3 7/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF COVAD'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 27 and 30) FILED JUNE 19, 2001 IN FLORIDA DOCKET NO. 001797-TP

Explanation of Proprietary Information

1. This information reflects vendor specific information/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 Statues such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 2 of 3 7/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF COVAD'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 27 and 30) FILED JUNE 19, 2001 IN FLORIDA DOCKET NO. 001797-TP

POD No. 27

Page No.	Line No/Column	Reason
	Lines 2, 4,5,6,7,8	1
POD No. 30		
Page No.	Line No/Column	Reason
Pg 2	Material Price Line Projected Actual Line Material Price Line Projected Actual Line Material Price Line	1 1 1 1
Pg 3	Projected Actual Line Material Price Per Sys Line Projected Actual Line	1 1
Pg 4	Material Price Line Projected Actual Line Material Price Line Projected Actual Line Material Price Line Projected Actual Line	' 1 1 1 1

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 3 of 3 7/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF COVAD'S RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 27 and 30) FILED JUNE 19, 2001 IN FLORIDA DOCKET NO. 001797-TP

POD NO. 30		
Pg 5	Projected Actual Line	1
Pg 6	Material Price Line	1
	Projected Actual Line	1
	Material Price Line	1
	Projected A0ctual Line	1
	Material Price Line	1
	Projected Actual Line	1
Pg 7	Projected Actual Line	1
Pg 8	Material Price Line	1
	Projected Actual Line	1
	Material Price Line	1
	Projected Actual Line	1
	Material Price Line	1
	Projected Actual Line	1
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