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September 26, 2001

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

Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification of its Response to Supplemental Interrogatory No. 12 to AT&T Communications of the Southern States, Inc.'s First Request for Production of Documents and First Set of Interrogatories dated July 18, 2001 which we ask that you file in the above-referenced docket.

A copy 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 by Federal Express as shown on the attached Certificate of Service.

Sincerely,

Lisa S. Foshee (VA)

Enclosures

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

DOCUMENT HI HOPER-DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE DOCKET NO. 960786-TL

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

Federal Express this 26th day of September, 2001 to the following:

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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Consideration of BellSouth)	
Telecommunications, Inc.'s entry into)	Docket No.: 960786-TL
InterLATA services pursuant to Section)	
271 of the Federal Telecommunications)	
Act of 1996.)	
	ý	Filed: September 26, 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 August 7, 2001, BellSouth Telecommunications, Inc. (BellSouth) filed its Responses to AT&T Communications of the Southern States, Inc.'s (AT&T) First Request for Production of Documents and First Set of Interrogatories dated July 18, 2001. On September 5, 2001, BellSouth filed its supplemental response to Interrogatory No. 12 which contains ALEC confidential business information that BellSouth is required to treat as proprietary. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification, indicating its intent to ask for confidential classification of this information.
- 2. BellSouth hereby files this Request for Confidential Classification of its response to Supplemental Interrogatory No. 12. The information contained in the response includes ALEC proprietary, confidential business information.
- 3. 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.

- 5. Attachment "B" to BellSouth's Request for Confidential Classification contains two copies of the document with the confidential information redacted.
- 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.
- 7. 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.
- 8. 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.
- 9. 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 26th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-TL Request for Confidential Classification Page 1 of 2 9/26/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO AT&T'S FIRST SET OF INTERROGATORIES, ITEM NO. 12 FILED SEPTEMBER 5, 2001 IN FLORIDA DOCKET NO. 960786-TL

Explanation of Proprietary Information

This information contains ALEC proprietary information that BellSouth is required to treat as
proprietary and confidential business information. By revealing the number and location of existing
BellSouth managed trunks to AT&T, the amount of customers AT&T serves and where could be
revealed as well.

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-TL Request for Confidential Classification Page 2 of 2 9/26/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO AT&T'S FIRST SET OF INTERROGATORIES, ITEM NO. 12 FILED SEPTEMBER 5, 2001 IN FLORIDA DOCKET NO. 960786-TL

INTERROGATORY NO. 12

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