

T. Michael Twomey  
Senior Regulatory Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0750

November 29, 2001

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
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 filed on November 8, 2001 pursuant to Order No. PSC-01-2017-FOF-TP, 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  
(21)

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

DOCUMENT NUMBER-DATE

15013 NOV 29 01

FPSC-COMMISSION CLERK

**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 29<sup>th</sup> day of November, 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  
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Tel. No. (678) 222--3469  
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cboone@covad.com  
Atty. for Covad

Joseph A. McGlothlin (+)  
Vicki Gordon Kaufman (+)  
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T. Michael Twomey (2)

**(+) 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: November 29, 2001

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On November 8, 2001, BellSouth filed cost studies pursuant to Order No. PSC-01-2017-FOF-TP, along with a Notice of Intent. These cost studies include vendor-specific pricing information, confidential business information and customer proprietary information that is considered proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's cost studies includes vendor-specific pricing information and other confidential business information that could cause competitive harm to BellSouth, and is confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.

3. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information 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 is a CD Rom containing the redacted cost studies.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents in CD-ROM form which are confidential and proprietary

6. The information contained in BellSouth's cost studies include vendor-specific pricing information, confidential business information and customer proprietary information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would provide competitors with an unfair advantage in future negotiations. Corresponding information on competitors is not available to BellSouth. The information discussed in this Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary 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 the Commission Clerk and Administrative Services 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 29<sup>th</sup> day of November, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_

Nancy B. White (22)  
James Meza III  
150 West Flagler Street  
Suite 1910  
Miami, Florida 33130  
(305) 347-5558

  
\_\_\_\_\_

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ATTACHMENT A

BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
COMPLIANCE COST STUDY FILED PURSUANT TO ORDER NO. PSC-01-  
2017-FOF-TP ON NOVEMBER 8, 2001, IN FLORIDA DOCKET NO. 001797-TP**

JUSTIFICATION FOR REQUEST

The subject information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would harm BellSouth's business operations because it 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 Section 119.07(1) and Section 24(a), Art.1 of the State Constitution.

COMPACT DISK

PROPRIETARY COST STUDY FILING CD

<u>FILE NAME</u>	<u>BASIS</u>
MDF_FUND.xls	1
Flyphcol.xls	1
FLPCpot.xls	1
Flpckey.xls	1
FLCollRT.xls	1
FLLineSh.xls	1
Fladjphc.xls	1

PAPER COPY

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
423	L	41 thru 51	1
425	L	133 thru 136	1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
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PAPER COPY (CONT'D)

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
426	F	18,19,34,36,39, 41 46,48,51,53,58,59, 61 and 63	1
427	F	68,69,71,73,88,90 92,94,96,98,103,105 107,109,111,113, 118 and 119	1
428	F	128, 129	1
429	C	10 thru 20	1
431	E	11 and 13	1
434	E	11,15,23 and 27	1
435	E	11,15,23 and 27	1
436	E	11,13,19 and 23	1
437	E	11,13,19 and 23	1
438	E	11,15, 21,25,31 and 35	1
440	E	11,15,21,25,31 and 35	1
441	E	19 and 21	1
442	E	12,14,24,26,28,30 and 32	1
443	E	11 and 13	1
444	E	11,13,15 and 17	1
476	G	19,21,24,26,31,33, 36,38,43,44,46,48,53, 54,56,58,63,65,67,69, 71,73,78,80,82 and 84	1
477	G	86 and 88	1
480	D	10,14,22 and 26	1
482	D	10,14,22 and 26	1
483	D	10,12,18 and 22	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 001797-TP**  
**Request for Confidential Classification**  
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PAPER COPY (CONT'D)

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
484	D	10,12,18 AND 22	1
485	D	10,14,20,24,30 and 34	1
486	D	10,14,20,24,30 and 34	1
509	F	13, 14, 18, 19, 23 thru 27, 31 thru 34, 38 thru 41 and 45 thru 47	1
510	F	53, 54, 58, 59, 63 thru 67, 71 thru 74, 78 thru 81 and 85 thru 87	1
512	E	10, 12, 22, 24, 36, 38, 40, 42, 46, 56, 58, 60 AND 64	1
513	E	74, 76, 78, 82, 92, 94, 98	1
514	E	10,12,22,24,36,38, 40, 42 46, 56, 58, 60 and 64	1
514.1	E	74, 76, 78, 82, 92, 94 and 98	1