

ORIGINAL

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March 4, 2002

Mrs. Blanca S. Bayó
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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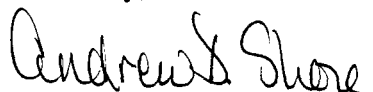
Re: Docket No. 990649A-TP (UNE Docket)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for AT&T and MCI's Supplemental Rebuttal Testimony of Brian F. Pitkin and Exhibits BFP-11, BFP-13, BFP-15 and BFP-18 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,



Andrew D. Shore (CA)

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

This confidentiality request was filed by or for a "telco" for DN 02500-02. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 01621-02)

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**CERTIFICATE OF SERVICE
Docket No. 990649A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
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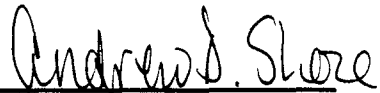
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Andrew D. Shore (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network element)
Docket No.: 990649A-TP
_____) Filed: March 4, 2002

**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 February 11, 2002, AT&T and MCIWorldCom filed Supplemental Rebuttal Testimony of Brian F. Pitkin. This testimony as well as exhibits BFP-11, BFP-13, BFP-15 and BFP-18 contained BellSouth proprietary information. These exhibits 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 redacted copy of the documents for public disclosure.

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

6. The information contained in the Supplemental Rebuttal Testimony of Brian F. Pitkin as well as Exhibit Nos. BFP-11, BFP-13, BFP-15, BFP-18 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 4th day of March, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE SUPPLEMENTAL REBUTTAL TESTIMONY OF BRIAN F. PITKIN AND EXHIBIT NOS. BFP-11, BFP-13, BFP-15 AND BFP-18 AS FILED ON FEBRUARY 11, 2002 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 990649A-TP

Explanation of Proprietary Information

1. 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, BellSouth uses it in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret that should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.
2. This information contains competitive business information, BellSouth's Regional Telephone Plant Index. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. 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, exempt from the Open Records Act.
3. This information contains competitive business information. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. 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, exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
Page 2 of 2
3/4/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE SUPPLEMENTAL REBUTTAL TESTIMONY OF BRIAN F. PITKIN AND EXHIBIT NOS. BFP-11, BFP-13, BFP-15 AND BFP-18 AS FILED ON FEBRUARY 11, 2002 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 990649A-TP

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