

September 10, 2002

BY HAND DELIVERY

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

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02 SEP 10 PM 3:35
COMMISSION
CLERK

Re: **CONFIDENTIAL MATERIALS**
Re: Docket No. 020129-TP (BellSouth's CCS7 tariff)

Dear Ms. Bayó,

Enclosed are an original and fifteen (15) copies of WorldCom's Request for Specified Confidential Classification of the Direct Testimony of Mark Argenbright and Exhibit MA-1, which we ask you to file in the above-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,

Donna Canzano McNulty
Donna Canzano McNulty

cc: Parties of Record

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

325 John Knox Road, Suite 105
Tallahassee, FL 32303
850 422 1254
Fax 850 422 2586

This confidentiality request was filed by or for a "telco" for DN 0959602. 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.

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DOCUMENT NUMBER-DATE

09596 SEP 10 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition of US LEC of Florida, Inc.,) Docket No. 020129-TP
Time Warner Telecom of Florida, L.P., and)
ITC^DeltaCom Communications objecting to) Filed: September 10, 2002
and requesting suspension of proposed CCS7)
Access Arrangement tariff filed by BellSouth)
Telecommunications, Inc.)
_____)

**WORLDCOM, INC.'S REQUEST FOR
SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services, LLC (collectively "WorldCom") and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On July 1, 2002, WorldCom filed its Direct Testimony and Exhibits of Mark Argenbright. The direct testimony on page 3 indicates the increase in costs specific to WorldCom incurred based on the usage of the BellSouth services and is confidential business information of WorldCom. Likewise, Exhibit MA-1, attached to the Mr. Argenbright's testimony depicts the messages per minute in its comparison of BellSouth's CCS7 and Local Switching Usage and is confidential business information of WorldCom. On the same day, WorldCom filed a claim of confidentiality pursuant to Section 364.183, Florida Statutes.

2. WorldCom hereby files this Request for Specified Confidential Classification because the information contained in WorldCom's Direct Testimony of Mark Argenbright and Exhibit MA-1 is confidential business information that could cause competitive harm to WorldCom and is confidential and proprietary under Section 364.183, Florida Statutes.

3. Attachment A to WorldCom'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 WorldCom as confidential.

4. Attachment B to WorldCom's Request for Confidential Classification is a redacted copy of the confidential information.

5. Attachment C to WorldCom's Request for Confidential Classification is a proprietary copy of the confidential information.

6. The information contained on page 3 of the Direct Testimony and Exhibit MA-1 of Mark Argenbright filed on July 1, 2002, includes confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of WorldCom's confidential business information would impair the competitive business of WorldCom and would cause harm to WorldCom's business operations. Therefore, such information should be classified as confidential business information pursuant to Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

7. WorldCom 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.

8. 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, WorldCom 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 10th day of September, 2002.


Donna Canzano McNulty
WorldCom, Inc.
325 John Knox Road, Ste. 105
Tallahassee, FL 32303
(850) 422-1254

Attorney for WorldCom, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail and/or hand deliver (*) to all known parties of record in Docket No. 020129-TP this 10th day of September, 2002.

Jason Fudge*
Adam Teitzman
FL Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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c/o Ms. Nancy H. Sims
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Tallahassee, FL 32301-1556

Florida Cable Telecommunications Assoc.,
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Tallahassee, FL 32303

ITC^DeltaCom
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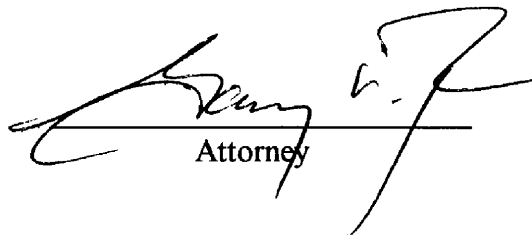
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Attorney

ATTACHMENT A

**WorldCom, Inc.
FPSC Docket No. 020129-TP
Request for Confidential Classification**

Page 1 of 1

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE DIRECT
TESTIMONY OF MARK ARGENBRIGHT AND EXHIBIT MA-1 AS FILED ON
JULY 1, 2002 IN DOCKET NO. 020129-TP**

Explanation of Proprietary Information.

A. The information identified as proprietary on page 3, line 23, in the direct testimony of Mark Argenbright contains proprietary confidential business information. Specifically, the information compares the additional costs incurred by WorldCom for ISUP and TCAP messages and the savings represented by the reduction in the local switching rate between February 2002 and June 2002, and thus depicts the increase in costs WorldCom has incurred. This information is highly competitive business information and should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d), Florida Statutes, and is exempt from the Open Records Act.

Likewise, Exhibit MA-1, attached to the Direct Testimony of Mark Argenbright, compares the CCS7 and local switching usage. The vertical axis depicts the number of WorldCom messages/minutes from February 2002 to June 2002. This information is highly competitive business information and should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d), Florida Statutes, and is exempt from the Open Records Act.

PAGE NUMBER

BASIS FOR REQUEST

| | |
|---|---|
| Argenbright, Direct Testimony, Page 3, line 23 | A |
| Exhibit MA-1 - all numbers on the vertical axis (other than the "0") | A |

ATTACHMENT B

1 messages are involved in accessing databases such as LIDB and LNP.) The
2 filing also deletes the CCS7 access arrangement that was previously located in
3 BellSouth's Florida General Subscriber Service Tariff at Section A35, directing
4 CMRS providers to the Access Services Tariff for continued CCS7 access
5 arrangements. Finally, the filing makes various "administrative" changes that
6 unsuccessfully attempt to portray the CCS7 Access Arrangement as a "new"
7 service.

8 **Q. BELLSOUTH PORTRAYS THIS TARIFF FILING AS "REVENUE**
9 **NEUTRAL." DO YOU AGREE WITH THIS CHARACTERIZATION?**

10 A. No. While it is true that the rates for local switching are reduced and the rates
11 for CCS7 service are increased, there is no support in the filing demonstrating
12 that the demand for each of these individual services, when applied to these
13 rates, actually result in the same amount of revenue for BellSouth. Further,
14 there is no indication as to the trend of demand for these services, which would
15 be necessary in order to understand the revenue impact on a going forward basis.

16 **Q. HAS THE IMPACT OF THESE RATE CHANGES HAD A NEUTRAL**
17 **EFFECT WITH RESPECT TO WORLDCOM'S COSTS BASED ON THE**
18 **USAGE OF THESE TWO SERVICES?**

19 A. No. In comparing the additional costs incurred by WorldCom for ISUP and
20 TCAP messages and the savings represented by the \$0.0001 reduction in the
21 local switching rate for the time period from February 2002 to June 2002,
22 WorldCom has seen an increase in its costs in excess of *****PROPRIETARY**
23 **REDACTED PROPRIETARY*****. Of course, where WorldCom sees this as

Comparison of CCS7 and Local Switching Usage

