

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for emergency relief by Supra Telecommunications & Information Systems against BellSouth Telecommunications, Inc., concerning collocation and interconnection agreements.

DOCKET NO. 980800-TP  
ORDER NO. PSC-99-0292-CFO-TP  
ISSUED: February 12, 1999

ORDER GRANT REQUESTS FOR CONFIDENTIAL TREATMENT  
OF DOCUMENT NOS. 12556-98, 12559-98, AND 12619-98

On June 30, 1998, Supra Telecommunications & Information Systems (Supra) filed a Petition for Emergency Relief Against BellSouth Telecommunications, Inc. (BellSouth). By its Petition, Supra asks that we require BellSouth to permit Supra to physically collocate its switch equipment in BellSouth's Golden Glades and West Palm Beach Gardens Central Offices. On July 20, 1998, BellSouth filed its Answer and Response to Supra's Petition. We held an administrative hearing regarding this matter on October 21, 1998.

On November 6, 1998, BellSouth filed a request for confidential classification of late-filed deposition exhibit JR-1 for Jerry Rubin and late-filed deposition exhibit WKM-1 for W. Keith Milner, Document No. 12556-98 and referenced Document No. 11588-98. On that same day, BellSouth also filed requests for confidential treatment of the copies of its responses to Supra's First and Second Set of Interrogatories that were provided to Commission staff, Document No. 12559-98 and referenced Document No. 11590-98, and the transcript of the deposition of Barbara Cruitt, Document No. 12619-98 and referenced Document No. 11659-98. BellSouth asserts that these documents contain information that would impair its ability to compete if the information were disclosed. BellSouth states that it treats this information as confidential and proprietary information pursuant to Section 364.183, Florida Statutes. Thus, BellSouth argues that this information should be granted confidential treatment pursuant to Section 364.183, Florida Statutes.

Florida law presumes that documents submitted to governmental agencies shall be public records. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to the

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specific terms of a statutory provision. This presumption is based on the concept that government should operate in the "sunshine." Rule 25-22.006(4)(c), Florida Administrative Code, provides that it is the Company's burden to demonstrate that the documents fall into one of the statutory examples set out in Section 364.183, Florida Statutes, or to demonstrate that the information is proprietary confidential information, the disclosure of which will cause the Company or its ratepayers harm.

Specifically, BellSouth seeks confidential treatment of the specific lines and columns on the pages of Document No. 12556-98 that are identified in Attachment A to this Order. BellSouth argues that the information identified in Attachment A includes business plans and forecasts, which would allow competitors to have an unfair advantage if publicly disclosed. BellSouth also argues that certain identified information relates to BellSouth's marketing strategies. BellSouth claims that disclosure of this information would also give competitors an unfair advantage in the market over BellSouth. BellSouth further argues the Attachment A identifies vendor specific information contained in these late-filed deposition exhibits. BellSouth considers this information to be a trade secret the disclosure of which would impair BellSouth's ability to enter into vendor contracts with reasonable terms. Further explanation of BellSouth's rationale is included in Attachment A.

Regarding its request for confidential treatment of Document No. 12559-98, BellSouth has specifically requested confidential treatment of the lines and columns on the pages identified in Attachment B to this Order. BellSouth argues that the identified information is competitive business information the disclosure of which would impair its ability to compete. BellSouth indicates that the information includes market research and analysis that would allow BellSouth's competitors to enter and compete in the market without having to expend money and resources on market research and development. BellSouth also asserts that the information identified in Attachment B contains floor plans of BellSouth's central offices. BellSouth believes that disclosure of this information would impair its ability to keep these offices secure. Further explanation of BellSouth's rationale is included in Attachment B.

As for its request for confidential treatment of the transcript of the deposition of Barbara Cruitt, Document No. 12619-98, BellSouth has specifically requested confidential treatment of

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the lines and columns on the pages identified in Attachment C to this Order. BellSouth argues that the information identified in Attachment C includes business forecasts and plans that would impair BellSouth's ability to compete if the information were disclosed. In addition, BellSouth contends that the information identified contains vendor specific prices and information negotiated by BellSouth. BellSouth asserts that disclosure of this information would inhibit BellSouth's ability to contract for goods and services at reasonable prices and on favorable terms. BellSouth states that it treats this information as a trade secret; thus, it should be granted confidential treatment in accordance with Section 364.183, Florida Statutes. Further explanation of BellSouth's rationale is included in Attachment C.

Section 364.183(3), Florida Statutes, states, in pertinent part, that proprietary confidential business information is information that

. . . is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Based on the definition of proprietary confidential business information in Section 364.183(3), Florida Statutes, it appears that the information for which BellSouth seeks confidential classification is proprietary information that, if disclosed, would cause harm to the company or its ratepayers because it would impair BellSouth's ability to compete. It shall, therefore, be granted confidential treatment in accordance under Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

Based on the foregoing, it is therefore

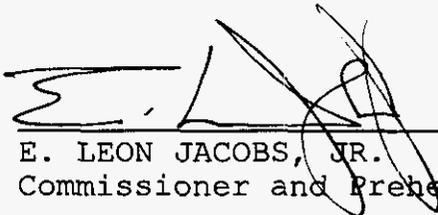
ORDERED by Commissioner E. Leon Jacobs, as Prehearing Officer, that BellSouth Telecommunications, Inc.'s requests for confidential treatment of Document Nos. 12556-98, and referenced Document No. 11588-98, 12559-98, and referenced Document No. 11590-98, and 12619-98, and referenced Document No. 11659-98, are hereby granted. It is further

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ORDERED that pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, any confidentiality granted to the material specified herein shall expire eighteen (18) months from the date of the issuance of this Order in the absence of a renewed request for confidentiality pursuant to Section 364.183, Florida Statutes. It is further

ORDERED that this Order will be the only notification by the Commission to the parties concerning the expiration of the confidentiality time period.

By ORDER of Commissioner E. Leon Jacobs, Jr. as Prehearing Officer, this 12th Day of February, 1999.

  
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E. LEON JACOBS, JR.  
Commissioner and Prehearing Officer

( S E A L )

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NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.038(2), Florida Administrative Code, if issued by a Prehearing Officer; (2)

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reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or (3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of Records and Reporting, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

**BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Rubin/Milner Late Filed Deposition  
Exhibits Nos. 1  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF LATE FILED  
DEPOSITION EXHIBITS NOS. 1 FOR RUBIN AND FOR MILNER FILED  
OCTOBER 16, 1998, IN DOCKET 980800-TP**

**Explanation of Proprietary Information**

1. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
2. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis; names of individuals assigned to certain projects; key details relating to the substance of such projects as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive response. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
3. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. 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 pursuant to Section 364.183(3) and (3)(d), Florida Statutes.

# ATTACHMENT A

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## RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
2	Lines 1,2,8	1 and 3
	Dig Net Inter Column	1
	ISDN LTE Column	1
	Net Dbl Shelf Column	1
	Pwr Dist Cont Column	1
	Speech Link Con Column	1
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 33,34,38	1 and 3
3	Line 6	1 and 3
	Spares Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 13,14,18	1 and 3
4	Line 3	1 and 3
	SW Feature Pkgs Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 47,48,52	1 and 3
5	Line 3	1 and 3
	Equip Desc Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 49,50,54	1 and 3

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**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
6	Line 3	1 and 3
	Equip Desc Column	1
	Product Code Column	1
	Cust Add	1
	Add Column	1 and 3
	Lines 49,50,54	1 and 3
8	Lines 1,8	1 and 3
	Dig Trk Equip Column	1
	ENET Column	1
	STP Link Interf	1
	Pwr Dist Cont	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 41,42,46	1 and 3
9	Line 5	1 and 3
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 10,11,15	1 and 3
11	Lines 1,8	1 and 3
	Dig Trk Equip Column	1
	ENET Column	1
	Pwr Dist Cont	1
	Mtce Tools	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 37,38,42	1 and 3

RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
13	Lines 1,8	1 and 3
	Supernods Column	1
	Dig Net Inter Column	1
	Dig Trk Equip Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 42,43,47	1 and 3
14	Lines 1,5	1 and 3
	Equip Desc Column	1
	ENET Column	1
	STP Link Inter Column	1
	Pwr Dist Cont Column	1
	Speech Link Con Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 43,44,48	
15	Line 1,5	1 and 3
	Equip Desc Column	1
	Mtce Tools Column	1
	Trk Mod Equip Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 2,26,30	1 and 3
16	Lines 1,5	1
	Spares Column	1
	Prodcut Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 26,27,31	1 and 3

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**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
17	Lines 1,2	1 and 3
	SW Feature Pkg Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 14,15,19	1 and 3
19	Lines 1,2,8	1 and 3
	Bought direct Column	1
	Supernode Column	1
	Dig Net Inter Column	1
	DigTrk Equip Column	1
	Line Conc Equip Column	1
	ISDN LCE Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 38,39,43	1 and 3
20	Lines 1,5	1 and 3
	Line Grp Equip Column	1
	ISDN LGE Column	1
	STP Link Intf Column	1
	LME4-Port Column	1
	Net Dbl Shelf Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 40,41,45	1 and 3

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**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
21	Lines 1,5	1 and 3
	Pwr Dist Cont Column	1
	Subs Carr Mod Column	1
	Speech Link Con Column	1
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 24,25,29	1 and 3
22	Lines 1,5	1 and 3
	Spares Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 9,10,14	1 and 3
23	Lines 1-5,18,29,30,32	1 and 3
24	Lines 1,5,6,8-10,12,14,15,17-23	1
25	Lines 1,2,4,10,16,18	1
26	Lines 25,24,23, B	1
27	Lines 30,29,28,27,26,B	1
28	Lines 27,26,25,B	1
29	Lines 1,2,4-8,12,13,15,17,18	1
30	Lines 1-4	3
	Remit To Column	3
	Lines 5-17	1 and 3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
31	Lines 1-5	3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3
32	Lines 1-5	3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3
33	Lines 1-5	3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3
34	Lines 1-5	3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3
	Lines 1-3	

**MILNER LATE FILED DEPOSITON EXHIBIT NO. 1**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
4	Section of graph covering the years 1999-2000; Columns on chart showing the years 1999 and 2000.	1
8	Columns A and B	1
10	Section of graph covering the years 1999-2000; Columns on chart showing the years 1999 and 2000	1
14	Column A	1
15	Columns A and B	1
16	Section of chart showing the year 1999	1
17	Columns A, B, and C	1
18	Section of graph showing the years 1999-2002; Columns 2000, 20001 and 2002	1
19	Columns A and B	1
20	Column A	1
21	Columns A and B	1
22	Column A	1
23	Column A	1
24	Column A	1
25	Section of graph showing the years 1999-2002	1
26	Section of graph showing the years 1999-2001; spike graph showing the years 1999-2001; columns 1999-2001	1
27	Graph A, Section showing the years 1999-2001; graph B showing the years 1999-2001; Chart showing the years 1999-2001	1
28	Section of graph A showing the years 1999-2001; Graph B showing years 1999-2001; Columns 1999-2001	1

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
31	Columns A and B	1
32	Columns A, B, C, D, E, F, G, H and I	1
35	Columns A, B, C and D	1
36	Columns A, B, C, D, E, F, G, H, I, J and K	1
39	Column A	1
40	Columns A, B, C, and D	1
41	Section of graph showing year 1999 - 2001; Columns 1999 and 2000	1
42	Section of graph showing the years 1999 through 2000; Columns 1999 and 2000	1
43	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
44	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
45	Section of graph showing the years 1999 - 2001; column 2000	1
46	Section of graph showing the years 1999 - 2001; column 2000	1
47	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
48	Section of graph A showing the years 1999- 2001; section of graph B showing the years 1999-2001; columns 1999 and 2000	1
51	Columns A, B, C, D, E and F	1
52	Column A	1
53	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
56	Columns A, B, C and D	1
57	Section of graph showing the years 1999 - 2002; columns 1999, 2000, 2001, 2002	1
59	Columns A, B, C and D	1

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
60	Column A	1
62	Columns A, B, C and D	1
63	Column A	1
64	Graph A and B – section showing the the years 1999-2002; Columns 1999 – 2002	1
65	Graph A and Graph B – section showing the years 1999-2002; Columns 1999-2002	1
67	Columns A, B and C	1
69	Columns A, B and C	1
70	Section of graph showing the years 1999-2002; columns 1999-2001	1
71	Section of graph showing the years 1999-2002; columns 1999-2001	1
72	Section of graph showing the years 1999-2002; columns 1999-2001	1
73	Section of graph showing years 1999 – 2002; columns 1999-2001	1
74	Section of graph showing years 1999-2002 Columns 1999-2002	1
75	Section of graph showing the years 1999-2002; columns 1999-2001	1
76	Section of graph showing the years 1999-2002; columns 1999-2001	1
77	Section of graph showing the years 1999-2002; columns 1999-2001	1
78	Section of graph showing the years 1999-2002; columns 1999-2001	1
79	Section of graph showing the years 1999-2002; columns 1999-2001	1
80	Section of graph A and B showing the years 1999-2002; columns 1999-2001	1

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
82	Column A	1
83	Section of graph showing the years 1999-2002; columns 1999-2001	1
85	Column A	1
86	Section of graph showing the years 1999-2002; columns 1999-2001	1
87	Column A	1
88	Column A	1
89	Column A	1
90	Equipment Type; Column A and B; lines 1, 2 and 3	3
91	Equipment Type; lines 1, 4, 5, 7, 8, 11, 12 14, 15, 16, 17, 18, 24 and 26	3
92	Equipment Type Column; Lines 2, 3 7, 11, 18 and 20	3
93	Entire page	1
94	Section of graph showing months of November through October	1
95	Section of graph showing months of October through October	1
96	Section of graph showing months of October through October	1
97	Section of graph showing months of November through October	1
98	Section of graph showing the months of January through October	1
99	Section of graph showing the months of November through October	1
100	Section of graph showing the months of December through October	1
101	Section of graph showing the months of October through March	1

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
102	Section of graph showing the months of November through September	1
103	Section of graph showing the months of October through April	1
104	Equipment type column; lines 1, 2, 4, 7, 9, 10, 12, 14, 15, 16, 17, 18	3
105	Section of graph showing 12/1/99 through 9/1/99	1
106	Section of graph showing 9/1/98 through 9/1/99	1
107	Section of graph showing 9/1/98 through 9/1/99	1
108	Section of graph showing 9/1/98 through 9/1/99	1
109	Section of graph showing 11/1/98 through 9/1/99	1
110	Section of graph showing 11/1/98 through 5/1/99	1
111	Section of graph showing 11/1/98 through 8/1/99	1
112	Lines 1-7, 16, 18, 25-30	1, 3
113	Lines 1-7, 16-19, 21-24, 31-40	1, 3
114	Lines 1-7, 15-19, 21-24, 31-36	1, 3
115	Lines 1-2, 16-20	1, 3
116	Lines 1-2, 5-8, 19-26, 31-35	1, 3
117	Lines 1-2, 5-8, 21-25, 30-34	1, 3
118	Lines 1-5, 9-11, 13-17	1
119	Lines 2-5, 13-16, 18-21, 30-32	1, 3
120	Lines 2-5, 13-16, 18-21, 29	1, 3
121	Entire page	1
123-124	Entire page	1
125	Lines 23-25	1
126	Lines 16, 26-30, 38 40	1
127	Lines 25-27	1
128-129	Entire page	1, 3

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
130	Lines 2-5, 30	1, 3
131	Lines 1-5, 30-31	1, 3
132	Lines 1-5, 30-31	1, 3
133	Lines 1-5, 30-31	1, 3
134-180	Entire page	2

**BellSouth Telecommunications, Inc.  
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Staff's Request for BellSouth's  
Responses to Supra's Discovery  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
RESPONSES TO SUPRA'S DISCOVERY REQUESTED BY FLORIDA STAFF  
OCTOBER 13, 1998, IN DOCKET 980800-TP**

**Explanation of Proprietary Information**

1. The information requested concerns competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to intellectual property which was developed at significant expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as market research and market development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.
2. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
3. This information contains the floor plans of BellSouth central offices. These plans are considered to be proprietary and confidential business information. These offices have limited access and are the central focal point of telecommunications in their geographic location. Public disclosure of this information would impair BellSouth's ability to keep these office and the communications network secure. 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 pursuant to Section 363.183, Florida Statutes and is exempt from the open Records Act.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO SUPRA'S DISCOVERY REQUESTED BY FLORIDA STAFF  
OCTOBER 13, 1998, IN DOCKET 980800-TP**

**Explanation of Proprietary Information**

4. *This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis; names of individuals assigned to certain projects; key details relating to the substance of such projects as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive response. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.*
5. This information is considered by BellSouth to be employee personnel information unrelated to compensation, duties, qualifications or responsibilities. This information is a name and/or control number used to identify an employee in lieu of a social security number. Such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information.
6. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. 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 pursuant to Section 364.183(3) and (3)(d), Florida Statutes.

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**POD NO. 6**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		1 and 3

**POD NO. 8**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Lines 5-21	2
2	Lines 4-8, Columns 3 YR Growth Square Foot Space	2 2 2
3	Lines 11,12,14-19	2

**POD NO. 9**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		4 and 3

**POD NO. 17**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		4

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**POD NO. 24**

**North Dade Golden Glades File 10**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-25	Qty Column	2

**Continuing Property Record Report**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-50	Yr Qty Column	2
	Yr Mat Cost Column	2 and 6
	Yr In Plc Cost Column	2 and 6
	ECN	2
	ECN In Plc Cost Column	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Lines 4-11, 19-23, 25-29, 36-39	2 and 6
2	Lines 6, 14, 15	2 and 6
3	Lines 2, 3, 6-11, 23, 25-27, 31-34	2 and 6
4	Lines 2, 3, 6-11, 23, 25-57, 32-36	2 and 6
5	Lines 2, 3, 6-11, 22, 24-26, 30-33	2 and 6
6	Lines 1-8, 14, 32-38	2 and 6
7	Lines 4-9, 20, 22-24, 29-33	2 and 6
8	Lines 1-7, 15-19, 21-25, 31-36	2 and 6
9	Lines 1-7	2 and 6
10	Lines 1-8, 16-225, 32-37	2 and 6
11	Lines 1, 2, 4, 5	2 and 6
12	Lines 1-7, 15-25, 32-37	2 and 6
13	Lines 1-3	2 and 6
14	Lines 1-7, 15-25, 32-35	2 and 6
15	Lines 1-7, 15-25, 32-35	2 and 6
16	Lines 1-7, 15-19, 21-25, 32-35	2 and 6
17	Lines 2-8, 10-15, 17, 18, 20, 21	2 and 6
18	Lines 1-7, 15-19, 21-25, 32-36	2 and 6

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Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
19	Lines 1,2	2
20	Lines 1-7,15-19,21-25,32-35	2 and 6
21	Lines 1-5,7-10	2
22	Lines 1-7,15-19,21-25,32-35	2 and 6
23	Line 3	2
24	Lines 2,4,6,7	2
	Columns A-D	2
	Lines 31,32	2
25	Lines 1-7,15-19,21-25,32-35	2 and 6
26	Lines 1,3,4	2 and 6
27	Lines 1-8	2
28	Lines 1-7,15-19,21-25,32-35	2 and 6
29	Lines 1,3	2 and 6
30	Lines 2,6,7	2
31	Lines 1-7,15-19,21-25,32-35	2 and 6
32	Lines 1,3,4	2 and 6
33	Lines 2-6	2
34	Lines 1-7,15-19,21-25,32-35	2 and 6
35	Lines 1,3,4	2 and 6
36	Lines 2-4	2
37	Lines 1-7,15-19,21-25,32-35	2 and 6
38	Lines 1,3	2 and 6
39	Lines 1-5,7-12,14-18	2
40	Lines 1-7,15-19,21-25,32-35	2 and 6
41	Line 1	6
	Qty Column, Description Column	2
42	Lines 2-3	2
43	Lines 1-8, 16-20, 22-26,33-37	2 and 6
44	Lines 2-10,12,13	2
45	Lines 1-8,16-20,22-26,33-36	2 and 6
46	Lines 2-10,12,13	2

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
47	Lines 1-7,15-19,21-25,32-35	2 and 6
48	Lines 1-8,15,16,22,24,33-36	2 and 6
49	Lines 1-8,15,16,18,22,24,33-36	2 and 6
50	Lines 1-8,16,18,22,24,35,36	2 and 6
51	Lines 1-8,18,24,35-44	2 and 6
53	Lines 1,4,8	6
	Supernode Column	2
	Dig Net Inter Column	2
	Dig Trk Equip Column	2
	Product Code	2 and 6
	Cust Add Column	2
	Add Column	2
	Lines 12,13,17	2 and 6
54	Lines 1,5	6
	Equipment Desc Column	2
	ENET Column	2
	STP Link Interf Column	2
	Pwr Dist Cont	2
	Speech Link Con Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 43,44,48	2 and 6
55	Lines 1,5	2 and 6
	Equipment Desc Column	2
	Mtce Tools Column	2
	Trk Mod Equip Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 25,26,30	2 and 6

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
56	Lines 1,5	2 and 6
	Spares Column, Product Column	2
	Cust Add Column, Add Column	2 and 6
	Lines 26,27,31	2 and 6
57	Lines 1,3	2 and 6
	SW Feature Pkgs Column	2
	Product Code Column	2
	Cust Add Column, Add Column	2 and 6
	Lines 14,15,19	2 and 6
59	Lines 1,4,8	2 and 6
	Dig Trk Equip Column	2
	ENET Column	2
	Pwr Dist Cont Column	2
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add, Add Column	2 and 6
	Lines 37,38,42	2 and 6
60	Lines 1-8,18,24,33-37	2 and 6
61	Lines 1-8,18,24,36-40	2 and 6
62	Lines 1-8,15,33,34,36-40	2 and 6
63	Lines 1-8,18,24,36,37	2 and 6
65	Lines 1,4,8	2 and 6
	Equip Desc Column	2
	ISDN Lte Column	2
	Net Dbl Shelf Column	2
	Pwr Dist Cont	2
	Speech Link Con	2
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 33,34,38	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
66	Lines 1,5	2 and 6
	Spares Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 12,13,17	2 and 6
67	Lines 1,2	2 and 6
	Columns SW Feature	2
	Product Code Column	2
	Cust Add column	2
	Add Column	2 and 6
	Lines 46,47,51	2 and 6
68	Lines 1,2	2 and 6
	Equip Desc Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 48,49,53	2 and 6
69	Lines 1,2	2 and 6
	Equip Desc Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 48,49,53	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
71	Lines 1,2,8	2 and 6
	Equip Desc Column	2
	Supernode Column	2
	Dig Net Inter Column	2
	Dig Trk Equip	2
	Line Conc Equip	2
	ISDN LCE Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 38,39,43	2 and 6
72	Lines 1,5	2 and 6
	Line Grp Equip Column	2
	ISDN Lge Column	2
	STP Link Intf Column	2
	LME4-Port Column	2
	Net Dbl Shelf Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 40,41,45	2 and 6
73	Line 5	6
	Pwr Dist Cont Column	2
	Subs Carr Mod Column	2
	Speech Link Con Column	2
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 24,25,29	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
74	Lines 1,5	2
	Spares Column	2
	Product Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 9,10,14	2 and 6
76	Lines 1,5	2 and 6
	Supernode Column	2
	Dig Net Inter Column	2
	Dig Trk Equip Column	2
	Input/Output Eqp Column	2
	Line Conc Equip Column	2
	Line Grp Equip Column	2
	Product Code Column	2
	Add Column	2
	Lines 36,37,41	2 and 6
	Equip Desc Column	2
	Net Dbl Shelf Column	2
	Pwr Dist Cont Column	2
	Subs Carr Mod Column	2
	Speech Link Column	2
	Mtce Tools Column	2
	Product Code Column	2
	Add Column	2
Lines 1,2,6	2 and 6	
78	Trk Mod Equip Column	2
	Product Code Column	2
	Add Column	2
	Lines 1,2,6	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
79	Lines 2	2 and 6
	Spares Column	2
	Product Column	2
	Add Column	2 and 6
	Lines 21,22,26	2 and 6
80	Line2	2 and 6
	SW Feature Pk Column	2
	SW Master Pk Column	2
	Non-CM NCL Column	2
	Product Code Column	2
	Add Column	2 and 6
	Lines 16,17,21	2 and 6
	Lines 1,2,8	2 and 6
	Dig Trk Equip column	2
	ENET Column	2
82	STP Link Column	2
	Pwr Dist Cont Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 41,42,46	2 and 6
	Line 5	2 and 6
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add Column	2
83	Add Column	2 and 6
	Lines 10,11,15	2 and 6

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<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		2

**POD NO. 28**

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Entire Document		3

**POD NO. 32**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-6	Reference Number	6

**POD NO. 33**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-247	Customer	5
	Authorizer	5
	User	5
	Person	5
	Accounts	6
	Actual	6
	Estimate	6
	Contractor	6

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**POD NO. 34**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Name of Employee Column	5

**POD NO. 44 & 45**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		1, 2 and 6

**ATTACHMENT A**

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Cruit Deposition  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CRUIT DEPOSITION  
FILED OCTOBER 19, 1998, IN DOCKET 980800-TP**

**Explanation of Proprietary Information**

1. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
2. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. 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 pursuant to Section 364.183(3) and (3)(d), Florida Statutes.

**ATTACHMENT A**

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**CRUIT DEPOSITION**

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21	2-4,21	1
33	14-16	1
38	6,7,17,20	1
39	6,7	1
40	2-5	1
41	22,24	1
42	1-3	1
45	6,7,10-12	1
50	8,22	1
51	3-8,11,14	1
	9	2
52	3-8,11,12,15,16,21,25	1
53	7,23	1
54	9,10,17,24	1
55	1,7,8	1
57	4,7-9,12,13,17,20-23	1
58	5,6	1
61	24,25	1
62	14-17	1
64	11-14,16,17,21,22	1
65	1-9	1
66	4,24	1
67	19-21,23,24	1
72	6-9,11-14	1
76	21-25	1 and 2
77	2-4,9-11,13,14	1
	6	2
78	25	1
79	1,5-12,16,17,20,21,25	1

CRUIT DEPOSITION (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
80	1-6	1
81	9,10	1
82	23	1
83	2,3,7,13,15,17-20,25	1
84	1,3,5,7	1
86	10-12	1
87	3-6	1
90	1-4	1
94	1	1
96	8,11-14,17	1
98	16,21	1
99	7,8,10	1
100	19-21	1
101	2,14,15,17,21-23,25	1
102	1,3-7,11,21-23,25	1
103	2,3,6,9,12-17,22-25	1
104	2,3,6-11,13-15,18-20	1
106	13,14,16,19,23,25	1
107	1,10-15,18-21,23	1
108	4,16	1
109	2,3,9,10,16,17	1
	13	2
110	7	1
111	25	1
112	2,4	1
122	9	1
123	7,8	1
124	14,15,19	1
126	8-11	1
127	17-20	1
129	11-14,16,17,23,24	1
130	5,7,8	1
131	3-10	1
132	3-5	1
134	24	1
135	4	1
139	12	1