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ORIGINAL  
FILE COPY

September 26, 1995

Mrs. Blanca S. Bayo  
Director, Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

Re: Docket No. 921074-TP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Sixth Request for Confidential Treatment of Data to be filed in the above mentioned docket.

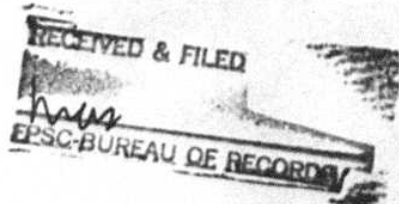
A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of BellSouth's Request have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Mary Jo Peed*  
Mary Jo Peed (MJP)

Enclosures

cc: Robert G. Beatty  
A. M. Lombardo  
R. Douglas Lackey  
All Parties noted on Certificate of Service



DOCUMENT NUMBER-DATE

09499 SEP 26 95

FPSC-RECORDS/REPORTING

BEFORE  
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection ) DOCKET NO. 921074-TP  
Phase II and Local Transport )  
Restructure )  
\_\_\_\_\_ ) September 26, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), pursuant to Rule 25-22.006 (5)(c), Florida Administrative Code, and files its Sixth Request for Confidential Classification.

1. The Florida Public Service Commission ("FLPSC") issued Order No. PSC-95-0034-FOF-TP on January 9, 1995 that directed BellSouth to file tariffs, cost support, contribution analyses, and demand data for the restructure of its switched access local transport services ("LTR services"). Petitions for reconsideration of that Order were filed, considered and then ruled upon in Order No. PSC-95-0680-FOF-TP, June 6, 1995.

2. On September 5, 1995, BellSouth filed its LTR services tariffs with accompanying cost support, contribution analyses, and demand data. In addition, BellSouth filed its Sixth Notice of Intent to Request Confidential Classification ("Sixth Notice"). The Sixth Notice was required because some of the information contained within the cost support data, contribution analyses, and demand data are exempted from public disclosure pursuant to §§ 119.07 and 364.183, Florida Statutes.

3. Pursuant to Rule 25-22.006(3)(a), BellSouth is, within the 21 days allowed by the Rule, filing its request for

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confidential classification of the information it contends is proprietary confidential business information.

4. Pursuant to Rule 25-22.006, Florida Administrative Code, BellSouth is affixing as Attachment "A" a listing identifying the page and line number at which the confidential material found. BellSouth has affixed as Attachment "B" two copies of the material in which the proprietary confidential business information has been redacted. Appended hereto as Attachment "C" is one copy of the material with the proprietary confidential business information highlighted. The material for which confidential classification is sought is intended to be and is treated by BellSouth as private and has not been disclosed.

5. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirements of public disclosure of §119.07, Florida Statutes. The information reflects the costs, the demand, and the financial contributions to BellSouth for providing the switched access local transport services. The costs were derived from a long run incremental cost study specific to Florida and is not readily available elsewhere. The demand data and contribution analyses are also not available outside of the Company. This information relates to the competitive interests of BellSouth and disclosure would impair the Company's competitive business. Pursuant to the actions of the 1995 Florida Legislature, local exchange telecommunications services, including switched access local

transport services, may be offered by any certificated firm beginning January 1, 1996. Since the effective date of the legislation, July 1, 1995, eleven firms have become certificated. Additionally, the record in this proceeding clearly established that access transport services, whether special or switched are already competitive in Florida. (See, Hearing Transcript, Docket No. 921074-TP pp. 63-64; 67-68). Lastly, the Commission has authorized expanded interconnection for alternative access vendors for switched, special access, and private line services. Special access and private line services are considered to be substitutable services for the switched access services of the local exchange companies. For these reasons, the disclosure of the data contained in the cost support, the contribution analyses, and the demand data would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services.

WHEREFORE, Southern Bell requests that the Commission grant its request for confidential treatment.

Respectfully submitted this 26<sup>th</sup> day of Sept., 1995.

ATTORNEYS FOR  
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**CERTIFICATE OF SERVICE**  
Dockets No. 921074-TL, 930955-TL,  
940014-TL, 940020-TL, 931196-TL, 940190-TL

I HEREBY CERTIFY that a copy of the foregoing has been  
furnished by United States Mail this 26<sup>th</sup> day of Sept., 1995, to:

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*Mary Jo Reed*  
Mary Jo Reed



Attachment A

9/26/95

FPSC DOCKET 921074-TP

**COST SUPPORT & CONTRIBUTION ANALYSIS  
FOR ZONE PRICING & LOCAL TRANSPORT RESTURCTURING TARIFFS**

**Explanation for Proprietary Information**

- A. 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. BellSouth is not able to obtain its competitor's cost to provide 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, 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, Florida Statutes and is exempt from the Open Records Act.
- B. This information reflects the actual and proposed demand for BellSouth's competitive dedicated and common transport services by Rate Zone in Florida. Using this information, competitors and potential competitors could determine demand for, the revenue received from, and the location of BellSouth's more lucrative transport markets. In addition, 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, Florida Statutes and is exempt from the Open Records Act.

**INDEX OF PROPRIETARY MATERIAL**

<u>Page No.</u>	<u>Line/Col. No.</u>	<u>Reason</u>
1, 2	Cols. B, C, D	A
3	Col. A (Costs)	A
5	Ln 37/Cols. D thru H	B
6, 7	Cols. D thru H	B
8	Lns. 13 thru 28/Cols. D thru H	B
11	Lns. 37 thru 39/Cols D thru H	B
12	Lns. 13 thru 21/Cols D thru H	B