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December 1, 1995

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 950985-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. Please file these documents 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,

Thomas B. Alexander
Thomas B. Alexander *(BWA)*

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
R. Douglas Lackey

RECEIVED & FILED
[Signature]
BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12037 DEC-1 95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory) Docket No. 950985-TP
rates, terms, and conditions for)
interconnection involving local)
exchange companies and alternative) Filed: December 1, 1995
local exchange companies pursuant)
to Section 364.162, Florida)
Statutes)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25.22.006, Florida Administrative Code, files its Request for Confidential Classification for certain information contained in answers provided to Staff in response to Staff's First Set of Interrogatories to BellSouth.

1. As a preliminary matter, on October 16, 1995 BellSouth filed its Notice of Intent to Request Confidential Classification for certain cost information contained in the response to Item 6 of Staff's First Set of Interrogatories. Subsequent to this filing, but prior to the date BellSouth would have been required to file its Request for Confidential Classification, the Commission entered its "Order Granting Joint Motion for Stay of Proceeding." This order was entered on October 20, 1995 and stayed further proceedings, not just the hearings, scheduled in this docket. Thus, BellSouth has not taken further action in this matter.

2. Staff has contacted BellSouth to inquire as to the status of the Request for Confidential Classification related to

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

the cost information. BellSouth's position, as stated above, is that this matter has been held in abeyance pursuant to the Commission's order staying the proceeding. The Staff, to the contrary, does not agree that the Commission's order affected the obligation of the Company to file its Request for Confidential Classification regarding this material.

3. Although BellSouth does not agree with this interpretation, it has no objection to filing the Request for Confidential Classification now. Indeed, the Company, on October 20, 1995, and before it knew the matter had been stayed, filed a Request for Confidential Classification addressing the source documents which also contain the confidential proprietary business information that is the subject of this Request for Confidential Classification. As a result, the analysis of and the rationale for protecting the information has already been prepared and previously submitted to the Commission on October 20, 1995.

4. BellSouth has appended to this Request for Confidential Classification as Attachment "A" a listing showing the location in the answer to Item 6 of the Staff's First Set of Interrogatories, of the information designated by BellSouth as confidential, as well as the required correlation with the specific justification for confidential classification.

5. Appended hereto in a package designated as Attachment "B" are two edited copies of the answer with the confidential information deleted.

6. Appended as Attachment "C" is a sealed package

containing copies of the answer with the material which is confidential and proprietary highlighted. Copies of Attachments "B" and "C" are not being served on the other parties in this proceeding.

7. With respect to the specific cost information provided in the answer to Staff's First Set of Interrogatories, this information is entitled to confidential classification on the basis that it is information relating to and affecting various competitive interests of BellSouth, the disclosure of which would impair BellSouth's business in a competitive environment. More specifically, public disclosure of this cost information would provide BellSouth's competitors and potential competitors with an advantage in that they would have access to BellSouth's usage cost information for providing interconnection services on a going forward basis, allowing those competitors and potential competitors to formulate more aggressive entry, marketing, pricing, and overall business strategies relating to BellSouth's services in Florida. Furthermore, BellSouth is not able to obtain comparable information from its competitors, and therefore, revealing this information will give BellSouth's competitors an inequitable and unfair advantage over BellSouth. This information is valuable cost information used by BellSouth in conducting its business and BellSouth strives to keep such information a secret. Therefore, such information is a trade secret which is considered to be proprietary confidential business information pursuant to Section 364.183(3)(a) and (e),

Florida Statutes.

8. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not generally been publicly disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential, proprietary business information, and, thus, not subject to public disclosure.

Respectfully submitted this 1st day of December, 1995.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
Docket No. 950985-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by Federal Express this 1st day of December, 1995 to:

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ALLTELL FLORIDA, INC.
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LIVE OAK, FL 32060
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TELEGRAPH COMPANY
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Thomas B. Alexander (pm)

Attachment A

FPSC DOCKET 950985-TP

FPSC STAFF'S 1ST INTERROGATORIES ITEM #6

Explanation for Proprietary Information

- A. This material is proprietary and confidential business material that contains cost information extracted from BellSouth's Switched Access Service Cost Study. These costs reflect BellSouth's usage costs of providing service on a going forward basis and would be useful to interconnection competitors and potential competitors, as well as other interconnectors in making decisions regarding entry, pricing, marketing and overall business strategies. BellSouth is not able to obtain this information from its competitors or interconnectors, therefore, it would be inequitable and unfair for BellSouth's competitors and interconnectors 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.

LOCATION OF THE PROPRIETARY INFORMATION

<u>ITEM NO.</u>	<u>LINE/COL.NOS.</u>	<u>REASON</u>
6	17, 18, 19	A