

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404)335-0710

November 6, 1996

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

RE: Docket No. 960833-TP; 960846-TP; 960916-TP

Dear Mrs. Bayo:

On October 25, 1996, BellSouth Telecommunications, Inc. filed its Request for Confidential Classification in the above captioned dockets regarding Daonne Caldwell's Late-Filed Deposition Exhibits taken on September 27 and October 7, 1996. The attached Request for Confidential Classification covers Item No. 74 which is also the Late Filed Exhibit Nos. 2 and 3 from Daonne Caldwell's October 7, 1996 deposition.

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 on the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White (AW)
Nancy B. White

- ACK _____
- AFA _____
- APP 1 _____
- CAF _____
- CMU Reith _____
- CTR _____
- EAG _____
- LEG 1 _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1 _____
- WAS _____
- OTH Mabilda _____

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

DOCUMENT NUMBER-DATE

11881 NOV-6 96

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 960916-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 6th day of November, 1996 to the following:

Staff Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Floyd R. Self, Esq.
Norman H. Horton, Jr., Esq.
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
(904) 222-0720

Brad Mutschelknaus
Kelley Drye & Warren, L.L.P.
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036

Nancy B. White (pw)

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 6th day of November, 1996 to the following:

Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904)425-6364
(904)425-6343 (fax)

Donna Canzano
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
(904)413-6204

Robin D. Dunson, Esq.
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309
(404)810-8689

Mark A. Logan, Esq.
Brian D. Ballard, Esq.
Bryant, Miller & Olive, P.A.
201 S. Monroe Street
Tallahassee, FL 32301
(904)222-8611

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314
(904)222-7500

Nancy B. White (for)

NANCY B. WHITE
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 600
Tallahassee, Florida 32301
(404)335-0710

October 25, 1995

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

RE: Docket No. 960833-TP; 960846-TP; 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,



Nancy B. White

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

COPI

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	
Communications of the Southern)	
States, Inc., MCI)	Docket No. 960833-TP
Telecommunications Corporation,)	
MCI Metro Access Transmission)	
Services, Inc., American)	Docket No. 960846-TP
Communications Services, Inc.)	
and American Communications)	
Services of Jacksonville, Inc.)	Docket No. 960916-TP
for arbitration of certain terms)	
and conditions of a proposed)	
agreement with BellSouth)	
Telecommunications, Inc.)	
concerning interconnection and)	Filed: October 25, 1996
resale under the)	
Telecommunications Act of 1996)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
 REQUEST FOR CONFIDENTIAL CLASSIFICATION
 AND MOTION FOR PERMANENT PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"),
 pursuant to Rule 25-22.006, Florida Administrative Division Code, and
 files its Request for Confidential Classification and Motion for
 Permanent Protective Order for the Late Filed Deposition Exhibits of
 Daonne Caldwell in the above captioned dockets.

1. BellSouth is filing its Request for Confidential
 Classification for the Caldwell Deposition Exhibits because it deems
 the information requested to be confidential and proprietary business
 information in that it reflects vendor specific prices and revenue and
 cost data. Since competitors who will offer local services can use
 this information as a resource, disclosure of this information would
 impair BellSouth's ability to compete.

~~DOCUMENT NUMBER-DATE~~
~~11881 NOV-68~~
~~FPSC-RECORDS/REPORTING~~

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the response with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the response with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. This information contains revenue and cost data which reflects BellSouth's long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. This same information on competitors is not available to BellSouth. 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. The information contained in Caldwell's Deposition Exhibits, as more

criteria, and should therefore be afforded confidential classification.

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

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

Respectfully submitted this 25th day of October, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(905) 347-5555



R. DOUGLAS LACKEY

NANCY B. WHITE

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0710

ATTACHMENT A

FPSC 960833/846-916-TP

LATE FILED DEPOSITION EXHIBITS
OF
DAONNE CALDWELL TAKEN 9/27/96 & 10/7/96

Explanation of Proprietary Information

This information contains costs which reflect BellSouth's total service and total element long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. This same information on competitors is not available to BellSouth. Additionally, this information is valuable to BellSouth in that it is used by BellSouth in the conduct of its business and BellSouth strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183 Florida Statutes.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO</u>
Exhibit # 2	
Page 32	Col. A, Lines 24,27,30,31,34,35
33	Lines 5,6,9,10
37	Cols. Unit Inv/Totalinv, Lines 7-11, 13-17,19-23,25-29,31-35,37-41,43-46
38	Cols. Unit Inv/Totalinv, Lines 7-12, 14-18,20-24,26-30,32-36,38-42,44-46
39	Cols. Unit Inv/Totalinv, Lines 6,7,9-13, 15-19,21-25,27-31,33-37,39-43,45,46
40	Cols. Unit Inv/Totalinv, Lines 6-8,10-14, 16-20,22-26,28-32,34-38,40-46
41	Cols. Unit Inv/Totalinv, Lines 6-16,21-25, 27-31,33-37,39-43

Attachment A
 Dockets 960833/846/916-TP
 Late Filed Deposition Exhibits
 D. Caldwell 9/27 and 10/7/96
 Page 2
 10/25/96

PAGE NO.

LINE/COL. NO.

Page 42
 44
 47-49

 58,61,63
 59,62,64
 70

Cols. Unit Inv/Total Inv
 Line 11
 Cols. Average Inv, Total Monthly
 Cost, Levelized Monthly Cost
 Cols. First, Addtl, Lines 3-9
 Cols. A,B,D-G
 Cols. A-F, Lines 30-32

Exhibit 2 (TSLRIC) Item no. 2

152
 153-155
 156,161,165-169
 157-160,162,163
 164
 171

 175-191
 192-194
 211
 212,213
 223
 224

 225

 227-230
 232
 234
 235
 236
 239
 241-247
 251
 252
 253

Lines 4,5,7,8,10,11
 Col. Expense in 1994
 Cols. A-C
 Cols. 1994-1997
 Cols. 1994-1997, marginalia
 Cols. 1994-1997, Lines 4,5,7-12,
 14-19,22-24
 Cols. A-G
 Cols. A-K
 Cols. A-I
 Cols. Jan-Dec, 1995-1997
 Col. A
 Col. A, Lines 6,26-29,33-36,38,42-44,
 49-51,53
 Col. A, Lines 6,26-29,33-36,38,40,42,
 44,46,48,52,54
 Col. A, Lines 5-9,18,20-28
 Cols. E,G,I,K,M
 Col. Levelized Inv
 Cols. A/B, Line 15, Cols. A,C-E
 Cols. A/B, Line 12, Cols. A,C-E
 Cols. A, Lines 1,10
 Col. A, Lines 5-9,18,20-28
 Cols. K,M
 Cols. K, M,O,P
 Cols. K,M,O-R

Attachment A
Docket 960833/846/916-TP
Late Filed Deposition Exhibits
D. Caldwell 9/27 and 10/7/96
Page 3
10/25/96

<u>PAGE NO.</u>	<u>LINE/COL. NO</u>
Page 256-260	Cols. D,F,H
261,264-270	Cols. D,F,I
262,263	Cols. A,C,F,H,J
271	Col. D
272	Cols. D,F
273,274	Cols. D,F,I
275	Cols. A,C,F,H,I,K,M
276	Cols. A,C,F,I,J,L,M
277,278,280	Cols. A,C,F,H,I,K,L
279	Cols. A,C,F,H,I.
281	Cols. A,B,D,E
282	Cols. A,E,F
285-292	Cols. 1995-1997, Lines 9-14,22-27
293	Cols. 1995-1997, Lines 9-14
294	Cols. 1995-1997, Lines 31-58
296,297	Cols. 1994-2003
298	Col. B (1995-1997)
300	Cols. B-D
307	Cols. A,B
314	Lines 12-14,23-25,34-36,40-43
317	Cols. A-C
329-332	Cols. 1989-1994
333-339	Cols. 1989-1993
340-343	Cols. 1993-2003
344-346	Cols 1991-2002
Item no. 5	
Page 384-385	Cols. A-C
Exhibit 3 (TELRIC)	
Page 31	Col. A, Lines 9,11,13,15,18 (marginalia); Lines 25,28,31,34
32	Lines 5,8
36-41	Cols. Unit Inv/Totalinv

Attachment A
Dockets 960833/846/916-TP
Late Filed Deposition Exhibits
D. Caldwell 9/27 and 10/7/96
Page 4
10/25/96

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>
Page 43	Line 11
46-48	Cols. D,F,H
57,59,61	Cols. C,D, Lines 3,5,7,9
58,60,62	Cols. A,B,D-G
71	Cols. D-I
142	Col. 1996 Florida, Lines 4,5,7,8
143-145	Col. D
146	Col. B-D
147-152	Cols. 1995-1998
153-155	Cols. 1996-1998
157	Lines 4,5
158	Cols. F-K
159-181	Col. Amount
182	Cols. D-I
183-185	Cols. B-L
205	Cols. 1996-1998
206	Col. Current Cost
221	Cols. Level Invt, Annual Weighted Direct Cost
222	Lines 8,24
226	Col. Florida, Lines 1,2,4-7
227	Cols. A-F
228,229	Cols. C,E,F,H,I
230	Lines 4-15
232	Cols. C-E
233,234,238-251	Cols. C-E,G-I
235,236	Cols. K,M,P,R,S
237	Cols. G,I,K,M,O,P
252,256,257	Cols. C-E,G
253-255	Cols. D,E,G
258,259	Cols. C,G
260,261	Cols. D,G
262,263	Cols. D,E,G
264	Cols. B,C,F,G,J,K
265-269	Cols. E,F,H-J
272-285	Lines 9-14,22-27
286	Lines 9-14

Attachment A
Dockets 960833/846/916-TP
Late Filed Deposition Exhibits
D. Caldwell 9/27 and 10/7/96
Page 5
10/25/96

PAGE NO.

LINE/COL. NO.

Page 287	Lines 31-57
290,291	Cols. 1994-2004
292,309	Cols. 1996-1998
294	Cols. B-D
310	Cols. Power&Common, Power Only
311	Col. Current Cost
316	Cols. 1996-1998
318	Lines 11-13,22-24,33-35,39-42
321,338	All Columns
333-337	Cols. 1988-1/95
339-340	Cols. 1994-2004
341,342	Cols. 1994-2003
343-346	All Columns

ATTACHMENT "B"

Two copies of the document with the confidential information
deleted.

ATTACHMENT "C"

One copy of the document with the material which is confidential and proprietary highlighted.

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 25th day of October, 1996 to the following:

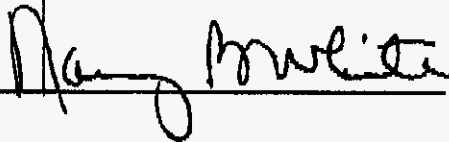
Tracy Hatch
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
(904)425-6364
(904)425-6343 (fax)

Donna Canzano
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
(904)413-6204

Robin D. Dunson, Esq.
1200 Peachtree Street, NE
Promenade I, Room 4038
Atlanta, GA 30309
(404)810-8689

Mark A. Logan, Esq.
Brian D. Ballard, Esq.
Bryant, Miller & Olive, P.A.
201 S. Monroe Street
Tallahassee, FL 32301
(904)222-8611

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
Tallahassee, FL 32314
(904)222-7500



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DOCKET NO. 960916-TP

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Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
(904) 222-0720

Brad Mutschelknaus
Kelley Drye & Warren, L.L.P.
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036

