

ORIGINAL
FILE COPY

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December 5, 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. 920260-TL

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
Nancy B. White (AW)

- ACK _____
- AFA _____
- APP _____
- CAF _____ Enclosures
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- JTH all to Matilda

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

DOCUMENT NUMBER-DATE
13034 DEC-5 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

In re: Comprehensive Review of the)
Revenue Requirements and Rate) Docket No. 920260-TL
Stabilization Plan of Southern Bell)
Telephone and Telegraph Company) Filed: December 5, 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 AT&T's First Set of Interrogatories filed on July 24, 1996 in Docket 920260-TL.

1. On October 30, 1996, AT&T provided as part of Hearing Exhibit No. 15, Item No. 2 of AT&T's First Set of Interrogatories, dated July 24, 1996 to the Florida Public Service Commission. BellSouth is filing its Request for Confidential Classification for Item No. 2 of AT&T's First Set of Interrogatories because it deems the information requested to be confidential and proprietary business information in that it reflects cost information. Since competitors who will offer such services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

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.

DOCUMENT NUMBER-DATE
13034 DEC-5 1996
FPSC-RECORDS/REPORTING

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

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

5. Regarding Item No. 2 of AT&T's First Set of Interrogatories, this information is entitled to proprietary confidential classification for the following reasons. The document contains actual unit cost information for discrete cost elements. 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. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in these interrogatories, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. 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 these interrogatories to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 5th day of December, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (AW)

ROBERT G. BEATTY

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c/o Nancy Sims

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CERTIFICATE OF SERVICE

Docket No. 920260-TL

Docket No. 900960-TL

Docket No. 910163-TL

Docket No. 910727-TL

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by United States Mail this 5th day of December, 1996 to:

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Nancy B. White (PH)

Attachment A

**FPSC DOCKET 920260-TL
AT&T's First Interrogatories Item 2
(Part of Hearing Exhibit 15)
Dated July 24, 1996
Filed August 23, 1996
December 5, 1996**

BST PROPRIETARY COST INFORMATION

Explanation for Proprietary Information

The information contained in BellSouth's response to AT&T Interrogatory dated July 24, 1996 in FPSC Docket 920260-TL (Re: \$48 million Rate Refund) filed on August 23, 1996 and offered as Exhibit 15 at the October 30, 1996 Hearing contains proprietary confidential cost information. These cost reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. 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. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. 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.

Attachment A

**FPSC DOCKET 920260-TL
PROPRIETARY COST INFORMATION**

LOCATION OF THE PROPRIETARY INFORMATION

PAGE NO.

LINE/COLUMN NUMBER

Interrogatory Item 2

LINES: 16, 17, 18