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February 28, 1997

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

Dear Ms. Bayo:

RE: ~~Undocketed~~ Traffic Study St. Augustine - Jacksonville

970202-TL

Enclosed please find an original and fifteen copies of BellSouth Telecommunication Inc.'s Traffic Study and Request for Specified Confidential Classification, which we ask that you file 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.

Sincerely,

J. Phillip Carver
J. Phillip Carver (JPC)

Enclosures

RECEIVED & FILED

[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02241 FEB 28 1997

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Traffic Study of St.)
Augustine and Jacksonville)

Docket: _____
Filed: February 28, 1997

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified confidential Classification for certain information included in BellSouth's Traffic Studies filed in the above-referenced docket.

1. On February 3, 1997, the Florida Public Service Commission ("Commission") requested BellSouth to file traffic studies on the above. In response to the Commission's request, BellSouth is filing a traffic study on these routes. This study contains traffic information that is proprietary confidential business information. This information is comprised of BellSouth's intraLATA traffic data regarding the above routes. Since the advent of intraLATA competition on January 1, 1992, these routes have been subject to toll competition and are thus qualified for confidential treatment.

2. In accord with Rule 25-22.006, Florida Administrative Code, the information that BellSouth considers proprietary has been highlighted for identification purposes and appended hereto as Exhibit "A". BellSouth has also appended hereto as Exhibit "B" two edited copies of the traffic studies with this confidential information removed. Finally, BellSouth has appended as Exhibit "C" a listing of the page and line at which this confidential information appears.

DOCUMENT NUMBER-DATE

02241 FEB 28 97

FPSC-RECORDS/REPORTING

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is entitled to confidential treatment by demonstrating how the information qualifies under the statutory provisions of §364.183. For the reasons set forth below, the data at issue constitutes "information relating to competitive interests, the disclosure of which would impair the competitive business..." of BellSouth (§364.183(3)(e)). Accordingly, it is exempt from public disclosure pursuant to §364.183.

4. The traffic data for the routes at issue in this proceeding essentially provide a blueprint of the toll usage over these various routes. This information is maintained by BellSouth on a proprietary and confidential basis in order that BellSouth may accurately plan its network deployment based on actual and perceived traffic demand over the respective toll routes.

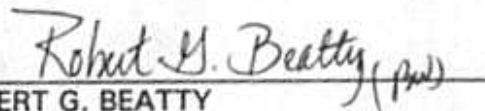
5. Although the traffic information is clearly necessary for a full examination of the merits of extended area service in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. With the advent of intraLATA toll competition effective January 1, 1992, this information could now subject BellSouth to competitive harm if it were made public. The disclosure of such traffic patterns to the public would make available to BellSouth's competitors highly valuable competitive information that such competitors could use to target the most lucrative routes.

6. The information for which confidential treatment is requested is intended to be and is treated as confidential by BellSouth and has not been disclosed to the public.

WHEREFORE, BellSouth respectfully requests that the Commission enter an order classifying the above-described traffic data as proprietary, confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, that is exempt from the public disclosure requirement of Section 119.07, Florida Statutes.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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BELLSOUTH TELECOMMUNICATIONS, INC.
REQUEST FOR CONFIDENTIAL CLASSIFICATION

JUSTIFICATION FOR CONFIDENTIALITY REQUEST

The following information identified by page and line number is confidential and proprietary:

<u>ATTACHMENT</u>	<u>PAGE NOS.</u>	<u>LINE NOS.</u>	<u>REASON PROPRIETARY</u>
A	1	1 - 2	1
A-1	1	1 - 2	1
A-2	1	1	1
B	1 - 2	1 - 28	1
D	2	1 - 4	1
F	1	1 - 2	1

Reason 1:

These traffic data relate to ECS usage over the various routes at issue. This is proprietary information maintained by BellSouth on a confidential basis to plan its network deployment based on traffic demand over the respective routes. The disclosure of this information would allow BellSouth's competitors in the intraLATA market to target the most lucrative routes and would thereby competitively harm BellSouth.