

EDWARD L. RANKIN, III
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150 South Monroe Street
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March 18, 1997

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

RE: Docket Nos. ~~960846~~-TP, 960846-TP and 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,

Edward L. Rankin III
Edward L. Rankin, III (EW)

Enclosures

cc: All Parties of Record
A. M. Lombardo
Nancy B. White
W. J. Ellenberg

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02820 MAR 18 97

FPSC-RECORDS/REPORTING

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: March 18, 1997
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 Cost Studies filed in response to the Commission's Order PSC-96-1579-FOF-TP dated December 31, 1996, in the above captioned matter.

1. BellSouth is filing its Request for Confidential Classification for the Florida Two and Four Wire Unbundled Sub-Loop (Distribution), Virtual Collocation, Physical Collocation, Switched Local Channel and Switched Dedicated DSI Directory Transport, Dedicated Transport (DSI Level), Four Wire Analog Port, Unbundled Network Interface Device (NID), and Network

DOCUMENT NUMBER-DATE

02820 MAR 18 97

FPSC-RECORDS/REPORTING

Interface Device Access TSLRIC Cost Studies because it deems the information requested to be confidential and proprietary business information in that it reflects the cost of various unbundled elements. 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.

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. Regarding these Cost Studies, this information is entitled to propriety confidential classification for two reason. First, the document contain 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 competitor 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 and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as propriety confidential business information any information relating to competitive business of the provider. The information contained in the Cost Studies, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

4. Second, the documents contain vendor-specific contractual and other information. This information is entitled to confidential classification pursuant to Section 364.183(3) and (3)(d), Florida Statutes. The Cost Studies contain references to vendor-specific pricing

negotiated by BellSouth. Public disclosure of this information would impair the Company's ability to contract for similar goods and services in the future on favorable terms. BellSouth often has opportunities to negotiate bulk discounts or other favorable pricing with its vendors. These vendors require that the terms of these contractual arrangements be kept confidential in order to avoid undue pressure from other customers to reduce prices or to give them similar terms and conditions in their contacts. Through public disclosure of such contractual information, these vendors providing crucial products and services to BellSouth could likely react by increasing BellSouth's prices or adversely changing favorable terms and conditions rather than lowering all other potential customers' prices for similar services or products or providing similar contractual arrangements enjoyed by BellSouth. Also, if vendor-specific information were subject to public disclosure, these vendors may withhold valuable information regarding propriety product or service capabilities which must be available for proper evaluation by BellSouth to fully analyze proposals from vendors in future negotiations. Moreover, if other vendors had access to the prices BellSouth is currently paying for its services, such vendors would be in an unfair bargaining position relative to BellSouth in future contract negotiations. Any of these results would cause harm to BellSouth in its operations and could tend to increase the Company's cost of doing business which, in turn, would be harmful to BellSouth's ratepayers. Thus, Section 364.183 (3)(d), Florida Statutes provides that this information is proprietary confidential business information exempt from the public inspection and examination provisions of Section 119.07 (1), Florida Statutes. Finally, pursuant to private agreements entered into with its vendors, BellSouth is under an obligation not to release this information to the public. Section 364.183 (3), Florida Statutes, specifically provides that proprietary

confidential business information includes information possessed by the Company which is subject to existing non-disclosure agreements with third parties, which if released, could be harmful to the Company.

5. 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 eight Florida TSLRIC Cost Studies to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 18th day of March, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE
DOCKET NOS. 960833-TP, 960846-TP and 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

Federal Express this 18th day of March, 1997 to the following:

TRACY HATCH
AT&T COMMUNICATIONS OF THE
SOUTHERN STATES, INC.
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Edward L. Rankin
Edward L. Rankin (PW)

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Request for Confidential Classification
Page 1
03/18/97

FPSC DOCKET 960833-TP

COST STUDIES REQUIRED BY FPSC ORDER PSC-96-1579-FOF-TP

2 AND 4 WIRE UNBUNDLED SUB-LOOP (DISTRIBUTION); VIRTUAL COLLOCATION; PHYSICAL COLLOCATION; SWITCHED LOCAL CHANNEL AND SWITCHED DEDICATED DS1 DIRECTORY TRANSPORT; DEDICATED TRANSPORT (DS1 LEVEL); 4 WIRE ANALOG PORT; UNBUNDLED NETWORK INTERFACE DEVICE (NID); NETWORK INTERFACE DEVICE ACCESS

Explanation of Proprietary Information

A. This information contains actual unit cost information for discrete cost elements for the item under study. These costs 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.

B. This information reflects vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. 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
Docket 960833-TP
Request for Confidential Classification
Page 2
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
	2 AND 4 WIRE UNBUNDLED SUB-LOOP (DISTRIBUTION)	
12	COL A,B,C/LN 6,8	A
24	COL B/ LN 8,11,14	A
25	COL C / LN 14,16,18,20,22	A
	LN 23,28,29,32,35	A
26	LN 5,8,11,13	A
28-31	COL M,N / LN 7-47	A
32	COL M,N / LN 7-45	A
33	LN 7-22	A
35	LN 18	A
38	COL D,F,H / LN 114-150	A
39	COL D, F, H / LN 18-54	A
43	COL C,D / LN 13-24	A
44	COL A-G / LN 16-37	A
45	COL C, D / LN 13-24	A
46	COL A-G / LN 16-37	A
53	COL D-I / LN 4-17	A

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 3
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
VIRTUAL COLLOCATION TSLRIC COST STUDY		
Page 12	Columns A,B,C Lines 10-17	A
Page 13	Columns B,C Lines 7-9	A
Page 16	Column A Lines 1-17	A
Page 17	Column A,B,C Lines 12-30, 33	A
Page 18	Columns A, B, C Lines 1-40	A
Page 19	Columns A, B, C Lines 1-40	A
Page 20	Columns A, B, C Lines 1 - 41	A
Page 21	Columns A, B, C Lines 1 - 40	A
Page 22	Columns A, B, C Lines 1 - 25, 30	A
Page 23	Columns A-D Lines 14-29, 33	A
Page 24	Columns A, Lines 1,5,9,14,18,22,26, 28,32,36	A
Page 25	Columns A - D Lines 14 - 29, 35	A
Page 26	Column A Lines 1, 7,13,19,25	A
Page 27	Columns A - D Lines 14- 29, 33	A
Page 28	Column A Lines 1-32	A
Page 29	Columns A - D Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 30	Column A Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 31	Column A Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 32	Column A-D Line 14-29, 33	A
Page 33	Column A Line 1-32	A
Page 34	Column A Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 35	Columns A Lines 1,5,9,13,17,21,25, 28,32,36	A/B

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 4
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>		<u>REASON</u>
VIRTUAL COLLOCATION TSLRIC COST STUDY			
Page 36	Column A	Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 37	Column A-D	Lines 14-29, 33	A
Page 38	Column A	Line 1-24	A
Page 39	Columns A	Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 40	Column A	Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 41	Column A-D	Lines 14-29, 33	A
Page 42	Column A	Line 1-24	A
Page 43	Column A	Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 44	Column A	Lines 1,5,9,13,17,21,25, 28,32,36	A/B
Page 48	Column A, B	Lines 2-29	A
Page 49	Columns A,B,D-G	Lines 3-16, 20	A
Page 50	Column A,B,D-G	Lines 4-14, 18	A
Page 51	Column A-D, F-M	Line 3-23, 27	A
Page 52	Column A-D, F-M	Line 3-23, 27	A
Page 53	Column A-D, F-M	Lines 3-27, 31	A
Page 54	Column A-D, F-M	Lines 3-23, 27	A
Page 55	Column A,B,D,E	Line 4-6,10,15-17,19, 24-26,28	A

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 5
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>		<u>REASON</u>
FLORIDA PHYSICAL COLLOCATION TSLRIC COST STUDY			
Page 13	Column A	Lines 19-23	A
Page 13	Column B	Lines 12-17	A
Page 13	Column C	Lines 15	A
Page 14	Column A	Lines 12-19	A
Page 14	Column B	Lines 12-15,21-23	A
Page 14	Column C	Lines 12-15,21-23	A
Page 17	Column A	Lines 1-32	A
Page 18	Columns A, B, C	Lines 12 - 27, 31	A
Page 19	Columns A, B, C	Lines 12 - 30, 33	A
Page 20	Columns A, B, C	Lines 1 - 40	A
Page 21	Columns A, B, C	Lines 1 - 40	A
Page 22	Columns A, B, C	Lines 1 - 42	A
Page 23	Columns A, B, C	Lines 1 - 35, 40	A
Page 24	Columns A, B, C	Lines 1 - 24, 33	A
Page 25	Columns A - D	Lines 14 - 29, 33	A
Page 26	Column A	Lines 1, 5, 9, 14, 18, 22, 26, 28, 32, 36	A
Page 27	Columns A - D	Lines 14- 29, 35	A
Page 28	Column A	Lines 1, 7, 13, 19, 25	A
Page 29	Columns A - D	Lines 14 - 29, 33	A
Page 30	Column A	Lines 1 - 34	A
Page 31	Column A	Line 1	B
Page 31	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 32	Column A	Line 1	B
Page 32	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 33	Column A	Line 1	B
Page 33	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 34	Column A	Line 1	B
Page 34	Column A	Lines 5, 9, 13, 17, 21, 27, 31, 34, 38, 42	A
Page 35	Columns A - D	Lines 14 - 29, 33	A

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 6
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>		<u>REASON</u>
FLORIDA PHYSICAL COLLOCATION TSLRIC COST STUDY			
Page 36	Column A	Lines 1 - 30	A
Page 37	Column A	Line 1	B
Page 37	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 38	Column A	Line 1	B
Page 38	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 39	Columns A - D	Lines 14 - 29, 33	A
Page 40	Column A	Lines 1 - 34	A
Page 41	Column A	Line 1	B
Page 41	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 42	Column A	Line 1	B
Page 42	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 43	Column A	Line 1	B
Page 43	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 44	Column A	Line 1	B
Page 44	Column A	Lines 5, 9, 13, 17, 21, 27, 31, 34, 38, 42	A
Page 45	Columns A - D	Lines 14 - 29, 33	A
Page 46	Column A	Lines 1 - 30	A
Page 47	Column A	Line 1	B
Page 47	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 48	Column A	Line 1	B
Page 48	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 49	Columns A - D	Lines 14 - 29, 33	A
Page 50	Column A	Lines 1 - 46	A
Page 51	Column A	Line 1	B
Page 51	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 52	Column A	Line 1	B

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 7
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION			
<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>		<u>REASON</u>
FLORIDA PHYSICAL COLLOCATION TSLRIC COST STUDY			
Page 52	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 53	Column A	Line 1	B
Page 53	Column A	Lines 5, 9, 13, 17, 21, 25, 29, 33, 36, 40, 44	A
Page 54	Column A	Line 1	B
Page 54	Column A	Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 55	Column A	Line 1	B
Page 55	Column A	Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 56	Column A	Line 1	B
Page 56	Column A	Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 57	Columns A - D	Lines 14 - 29, 33	A
Page 58	Column A	Lines 1 - 32	A
Page 59	Column A	Line 1	B
Page 59	Column A	Lines 5, 9, 13, 19, 23, 27, 31, 34, 38, 42	A
Page 60	Column A	Line 1	B
Page 60	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 61	Column A	Line 1	B
Page 61	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 62	Columns A - D	Lines 14 - 29, 33	A
Page 63	Column A	Lines 1 - 46	A
Page 64	Column A	Line 1	B
Page 64	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 65	Column A	Line 1	B
Page 65	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 66	Column A	Line 1	B
Page 66	Column A	Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A

**Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 8
03/18/97**

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
FLORIDA PHYSICAL COLLOCATION TSLRIC COST STUDY		
Page 67	Column A Line 1	B
Page 67	Column A Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 68	Column A Line 1	B
Page 68	Column A Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 69	Column A Line 1	B
Page 69	Column A Lines 5, 9, 13, 17, 21, 25, 27, 31, 35, 39	A
Page 70	Columns A - D Lines 14 - 29, 33	A
Page 71	Column A Lines 1 - 32	A
Page 72	Column A Line 1	B
Page 72	Column A Lines 5, 9, 13, 19, 23, 27, 31, 34, 38, 42	A
Page 73	Column A Line 1	B
Page 73	Column A Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 74	Column A Line 1	B
Page 74	Column A Lines 5, 9, 13, 17, 21, 25, 28, 32, 36	A
Page 78	Columns A, B Lines 2 - 34	A
Page 79	Columns A, B, D, Lines 3 - 14, 18 E, F, G	A
Page 80	Columns A, B, D, Line 1 E, F, G	A
Page 80	Column G Lines 8, 11, 16, 24, 29	A
Page 81	Columns A, B, D, Lines 4, 6, 8, 14, 18 E, F, G	A
Page 82	Columns A, B, C, Lines 3-23, 27 D, F, G, H, I, J, K, L, M	A
Page 83	Columns A, B, C, Lines 3-23, 27 D, F, G, H, I, J, K, L, M	A

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
FLORIDA PHYSICAL COLLOCATION TSLRIC COST STUDY		
Page 84	Columns A, B, C, Lines 3-27, 31 D, F, G, H, I, J, K, L, M	A
Page 85	Columns A, B, C, Lines 3-23, 27 D, F, G, H, I, J, K, L, M	A
Page 86	Columns A, B, D, E Lines 4, 5, 6, 10, 15, 16, 17, 19, 24, 25, 26, 28	A

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
	SWITCHED LOCAL CHANNEL AND SWITCHED DEDICATED DS1	
	DIRECTORY TRANSPORT	
12	COL. A LINE 9,11,12	B
12	COL. B,C LINE 9,11,12	A
17	COL. A LINE 1	B
18	COL. CAP INV*, OPR INV**, LINE ALL	B
19	COL. C,D,L-R LINE ALL, 15, 18	B
20, 21	COL. Utilized/Levelized Investment LINE ALL	B
24	COL. Monthly Cost LINE 5, 11	B
25	COL. CAP INV, OPR INV LINE ALL	B
26	COL. CAP INV, OPR INV LINE ALL	B
27	COL. C,D,L-R LINE ALL, 15,18	B
28	COL. C,D,L-R LINE ALL, 15,18	B
29	COL. Weighted Inv./357C&822C LINE 4,5,10,15,16,21,27	B
29	COL. Weighted Inv./845C LINE 15,16,21,27	B
29	COL. Weighted Inv./85C LINE 15,16,21,27	B
30	COL. C LINE 2,4,6,8,10,12,14,16,18,20,22,25 27,30,32,35,37-40,44-47	B
31	COL. C LINE 2,4,6,8,10,12,14,16,18,20,22,24, 26,28,30,33,35,38,40,43,45-48,52-55	B
38	COL. First, Add'l LINE ALL	A
39	COL. A,B,D-G LINE ALL	A
41	COL. First, Add'l LINE ALL	A
42	COL. A,B, D-G LINE ALL	A

* Capital Investment ** Operating Investment

**Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 12
03/18/97**

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
	DEDICATED TRANSPORT (DS1 LEVEL)	
Page 12	Columns A, B Line 10	A
Page 19	Columns A, B Lines 3-12	A
Page 20	Columns A,B,D-G Lines 7-30	A

Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 13
03/18/97

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>		<u>REASON</u>
4 WIRE ANALOG PORT			
9	COL. A-D	LINE 1-7	A
12	COL. A	LINE 1-6,8,12,22	B
12	COL. A	LINE 26,34	A
17	COL. A	LINE 3,8,11,29	A
18	COL. A, B	LINE 3,4,7,8,11,12,18,19, 22,23,26,26,29	A
19	COL. A	LINE 1,10,14,17,20	A

**Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 14
03/18/97**

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
	UNBUNDLED NETWORK INTERFACE DEVICE (NID)	
12	COL. A LINE 6	A
15	COL D,F,H LINE 14,16,19,21,24,26,28	A
15	COL. D-G LINE 39-42, 49,53	A

**Attachment A
Docket 960833-TP
Request for Confidential Classification
Page 15
03/18/97**

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
15	LINES 13,24,34	A