

J. PHILLIP CARVER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
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April 21, 1997

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 970281-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request For Confidential Classification, which we ask that you file in the captioned matter.

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.

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

Sincerely,

J. Phillip Carver

J. Phillip Carver (Pw)

RECEIVED & FILED
APR 21 1997
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04022 APR 21 97

FPSC-RECORDS/REPORTING

6/10/97
FILE COPY

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

In re:)	
)	
Establishment of Intrastate)	Docket No. 970281-TL
Implementation Requirements)	
Governing Federally Mandated)	Filed April 21, 1997
Deregulation of Local Exchange)	
Company Payphones)	
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**BELLSOUTH TELECOMMUNICATIONS, INC.'s REQUEST
FOR CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. At the Agenda Conference of March 18, 1997, the Florida Public Service Commission ("Commission") determined that BellSouth should file certain information in this docket by March 31, 1997. On March 31, 1997, the Commission entered in this matter Order No. PSC-97-0358-FOF-TP, which restated the requirement that information be filed in six separate categories.

2. BellSouth filed on March 31, 1997 the required information. At the same time, BellSouth filed its Notice of Intent to Request Confidential Classification.

3. BellSouth is filing a Request for Confidential Classification for the subject information because the information requested is confidential and proprietary business information that reflects vendor specific prices as well as revenue and cost data. Since competitors who will offer comparable services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

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

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

6. Appended as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary. Copies of Attachment

C are not being served on the other parties in this proceeding.

7. Some of the requested 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 unfair 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 should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

8. As to the other category of information for which BellSouth seeks confidential classification, 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 should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d), Florida Statutes and should be held exempt from the disclosure requirements of Section 119.07, Florida Statutes.

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

10. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 21st day of April, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ps)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

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Atlanta, Georgia 30375

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**CERTIFICATE OF SERVICE
DOCKET NO. 970281-TL**

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

served by U.S. Mail this 21st day of April, 1997 to the following:

Richard D. Melson, Esq.
Hopping, Green, Sams & Smith, P.A.
P.O. Box 6526
Tallahassee, FL 32314

Michael J. Henry, Esq.
MCI Telecommunications Corporation
780 Johnson Ferry Road, Suite 700
Atlanta, GA 30342

Monica Barone, Esq.
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Ms. Beverly Y. Menard
GTE Florida Incorporated
106 East College Avenue, Suite 1440
Tallahassee, FL 32301-7704

Mr. F. B. "Ben" Poag
Sprint-Florida, Inc.
P.O. Box 2214, MC2565
Tallahassee, FL 32316-2214

Ms. Harriet Eudy
ALLTEL Florida, Inc.
P.O. Box 550
Live Oak, FL 32060-3343

Ms. Laurie A. Maffett
Frontier Communications
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180 S. Clinton Avenue
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Mr. Bill Thomas
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Port St. Joe, FL 32457-1007

Mr. Robert M. Post, Jr.
Indiantown Telephone System, Inc.
P.O. Box 277
Indiantown, FL 34956-0277

Ms. Lynne G. Brewer
Northeast Florida Telephone
Company, Inc.
P.O. 485
Macclenny, FL 32063-0485

Mr. Thomas M. McCabe
Quincy Telephone Company
P.O. Box 189
Quincy, FL 32353-0189

Mr. John H. Vaughan
St. Joseph Telephone & Telegraph
Company
P.O. Box 220
Port St. Joe, FL 32456-0220

Mr. Bill Thomas
The Florida Telephone Company, Inc.
P.O. Box 1007
Port St. Joe, FL 32457-1007

Ms. Lynn B. Hall
Vista-United Telecommunications
P.O. Box 10180
Lake Buena Vista, FL 32830-0180

J. Phillip Carver (pm)
J. Phillip Carver

REQUEST FOR CONFIDENTIAL CLASSIFICATION

ATTACHMENT A

FPSC DOCKET 970281-TL

PAYPHONE SERVICES COST STUDIES

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.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO.</u>	<u>REASON</u>
Unbundled Loop		
F23B01X000012	Cols. A-C	A
21-22	Col. L	A
24	Cols. C; Lines 16-18, 31-33	A
25	Lines 7-9, 11, 13-15, 17	A
27	Cols. C; Lines 18, 23-24, 27, 30, 33	A
28	Lines 5, 8, 10-11	A
32-37	Cols. M-N	A
39	Line 11	A
42&44	Lines 117, 119, 121, 123, 125, 127, 130, 132, 134, 136, 139, 141, 143, 145, 147, 149, 151, 153-158	A
43	Lines 13, 15, 17, 19, 21, 23, 26, 28, 30, 32, 35, 37, 39, 41, 43, 45, 47, 49-54	A
53	Cols. C&D	A
54, 56, 58	Cols. A, B, D-G	A
55&57	Cols. C&D	A
60	Col. B	A
63	Lines 4-6; Col. B	A
64	Cols. D-I	A

Summary Sheet

A Lines 1 and 6 under Amount A

NTS Termination

3	Cols. A-C, Line 1	B
3	Cols. A-B, Line 2	A
4&5	Cols. A,B,K&L	B
6&7	All under Investment Data & Annual Expenses; Lines 13-20	B
6&7	Line 21	A&B

Customized Code Restriction Options 1 & 3

15	Lines 9-11 & 18-19	B
20,21	Line 20	A
22,28	Line 9;all under Value	B
23,25,29,31	Lines 12 & 15	B
23,25,26,27,29,31	Line 20	A
24,30	Line 9 & 11;all under Value	B
32,44	All under Value	B
33,38	Line 12, 14	B
33,34,38,39	Line 19	A
35,41	Line 7,8,14,20,21,27	B
35,41	Line 22	A
36,43	Line 7-9,14,20-22,27,28	B
36,43	Line 23	A
37	Line 8,10; all under Value	B
40	All under Line A;Line B1;all under Value	B
42	All under Line A;Line B1;Line C5; all under Value	B
45-50	All under Investment Data;all under Annual Expenses;Lines 14,16-18,20-25	B
51-56	Cols. A-D	B
57	Cols. A-C	B
57	Cols. D-G	A
58,59	Cols. A-C,Lines 13&14;Col.C,Lines 19&20	A
59	Col. C;Lines 25&26	A
60	Cols. A&B,Lines 13&14;Col.B,Lines 18&19A	A
61	Cols. A-C,Lines 13,14,18,19;	A

Customized Code Restriction Options 1 & 3 continued

62	Col. C, Lines 24&25 Cols. A-C, Lines 11,12,14,15	A
900/976 Blocking		
66	Col. A, Lines 9-11,18,19	B
72	Col. A; Cols. B&C, Lines 11&12; Col. C, Lines 17,18,23,24	A
73	Col. A; Col. B, Lines 11,12,17,18	A
76	Col. A, Lines 10-14,16-20,22-26,40	B
76	Col. A. Lines 35&39	A
77	Col. A. Lines 10-14,16-20,22-26,28-30,40	B
77	Col. A. Lines 32-35,39	A
78	All under Value	B
79	Lines 8-10,15; all under Value	B
79	Line 24	A
80	Lines 9,10,12-14,16,17; all under Value	B
81	Lines 8,9,15; all under Value	B
81	Line 23	A
82	Lines 9,11; all under Value	B
83	Line 20	A
84	Lines 13,15	B
84	Line 20	A
85	Lines 9,11; all under Value	B
86	All under Value	B
87	Lines 8-10,15; all under Value	B
87	Line 24	A
88	Lines 9-13,15,16; all under Value	B
89	Lines 8,9,15; all under Value	B
89	Line 23	A
90,93	Lines 9,11; all under Value	B
91,92	Line 20	A
92	Lines 13,15	B

Customized Code Restriction Option 2

101	Lines 9-11,18,19	B
107	Cols. A-C	B
107	Cols. D-G	A
108-113	Cols. A-D	B
114-119	All under Investment Data;all under Annual Expenses;Lines 14,16-18,20-25	B
120	Col. A	B
121,123,127,129	Lines 12,15	B
121,122,127,129	Line 20	A
122,128	Lines 9,11;all under Value	B
124,130	Lines 9;all under Value	B
125,126,131,132	Line 20	A
133	Lines 12,14	B
133	Line 19	A
134	Lines 8,10;all under Value	B
135	Lines 7-9,14;all under Value	B
135,136	Line 22	A
136	Lines 7,8,14;all under Value	B
137,138,144	Line 19	A
138	Lines 12,14	B
139	All under Value	B
140	Lines 7-9,14;all under Value	B
140,142	Line 22	A
141	Line 8,9,11-13,15,16;all under Value	B
142	Lines 7,8,14;all under Value	B
143	Lines 8,9,11;all under Value	B
145	Cols. A-C, Lines 13,14,19,20; Col. C, Lines 25&26	A
146	Cols. A; Col. B, Lines 13,14,19,20	A
147	Col. A; Col. B; Col. C, Lines 13,14,18,19,20,24,25	A
148	Col. A; Col. B; Col. C, Lines 13,14,19,20	A
149	Cols. A,B&C, Lines 11,12,13,14	A
150	Cols. A,B&C, Lines 11,12,14,15	A
151	Col. A; Col. B, Lines 13,14,19,20	A

Smartline

157	Lines 10,11,14&15	A
160	Line 14	B
161	Line 18	B
162	Cols. B-E,Lines 2-8; Cols. B&C,Line 10	A
163	Col. B,Lines 2,6-10	B
171	Col. A,Lines 3-5,20,21	B
172	Col. A; Col. B; Col. C, Lines 11,12,17,18, 23&24	A
173	Col. A; Col. B; Col. C, Lines 11,12,17,18	A
176,187	All under Investment;all under Annual Operating Costs;all under Capital Costs; all under Operating and Support Costs	B
176,187	All under Monthly Totals;all under Nonrecurring Costs	A
181	Cols. A&B, Line 8	A
183	Line 5	A
184	Lines 3,4,6,9,10,12	B
188	Lines 8,9,12&13	A
190-192	Cols. A-G	A&B
193,194	Cols. A-F	A&B
201	Col. A, all except Lines 10&17-20	A

Local Usage Detail

202	Col.A,Lines 9&11	A
	Cols.A-E,Lines 38,40,42	
203,206,208	Cols.A-E,Lines 47,50	A
	Col.A,Lines 52,63&66	
205	Col.A,Lines 9&11	A
	Cols.A-E,Lines 42,44,46	
207	Col.A,Lines 8&9;Cols.A-E,Lines 42,44,46	A

Coin Refund and Repair Service

226	Col.A,Line 8	B
226	Col.A,Lines 17-23	A
227	Col.A,Lines 3,5-8	B
228	Col.A,Lines 36,38,39,42-45	B
229	Col.A,Lines 59,60	A
230	Line 5,second number; Line 6,first number; Col.A,Line 2,4-8	A
231	All under Unit Investment	B
231	Col.A,Lines 12,13,15,16,19,26-30	B
231	Col.A,Lines 36-38,41-47,49,51	A&B