

FILE COPY

Legal Department

J. PHILLIP CARVER  
General Attorney

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

August 21, 1997

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

RE: Docket No. 960786-TL

Dear Mrs. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. We ask that this be filed 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 on the parties shown on the attached Certificate of Service.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- ROI \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Sincerely,

*J. Phillip Carver*  
J. Phillip Carver (AW)

Enclosures

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

RECEIVED & FILED  
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
08477 AUG 21 5  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of )  
BellSouth Telecommunications, )  
Inc.'s entry into interLATA )  
services pursuant to Section 271 )  
of the Federal Telecommunications )  
Act of 1996 )  
\_\_\_\_\_ )

Docket No. 960786-TL

Filed: August 21, 1997

BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION

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

1. On July 24, 1997, the Florida Public Service Commission ("Commission") Staff served upon BellSouth a Subpoena Duces Tecum without deposition, which called for the production of certain information. On July 31, 1997, BellSouth provided the requested information to the Staff. On that date, BellSouth also filed a Notice of Intent to Request Confidential Classification for the subject information.

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 two copies of the information with the confidential information deleted.

DOCUMENT NUMBER-DATE

08477 AUG 21 97

FPSC-RECORDS/REPORTING

4. Attached as Attachment C is a sealed envelope containing one highlighted copy of the information with the material which is confidential and proprietary.

5. Certain of the information requested details the quantity and types of services purchased from BellSouth by ALECs. Also, the information includes, in some cases, the termination location of these services. Public disclosure of this information could result in harm to the business operations of both BellSouth and of these subject ALECs.

6. Moreover, this information is customer specific information, the disclosure of which is generally prohibited by Section 364.24, Florida Statutes. Limited disclosure of this information pursuant to the subject subpoena is permissible under § 364.24. However, the statutory intent embodied in this section continues to apply. In other words, the legislature has manifested in § 364.24 its clear intent that information of this sort not be publicly disclosed. For this additional reason, it should be granted confidential classification pursuant to § 364.183, Florida Statutes.

7. The information for which BellSouth seeks confidential classification is not publicly available. 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 to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 21st day of August, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Robert G. Beatty (aw)*

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5555

*William J. Ellenberg II (aw)*

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0710

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 960786-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 21st day of August, 1997 to the following:

Mr. Brian Sulmonetti  
LDDS WorldCom Communications  
Suite 400  
1515 S. Federal Highway  
Boca Raton, FL 33432  
(407) 750-2529

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

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Atty. for FCCA  
(904) 222-2525

Thomas K. Bond  
MCI Telecommunications Corp.  
780 Johnson Ferry Road  
Suite 700  
Atlanta, GA 30342  
(404) 267-6315

Richard D. Melson  
Hopping Green Sams & Smith  
123 South Calhoun Street  
P.O. Box 6526  
Tallahassee, FL 32314  
(904) 222-7500

C. Everett Boyd, Jr.  
Ervin, Varn, Jacobs,  
Odom & Ervin  
305 South Gadsden Street  
P.O. Drawer 1170  
Tallahassee, FL 32302  
Atty. for Sprint  
(904) 224-9135

Benjamin W. Fincher  
3100 Cumberland Circle  
Atlanta, Georgia 30339  
Atty. for Sprint  
(404) 649-5145

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

Patrick K. Wiggins, Esq.  
Donna L. Canzano, Esq.  
Wiggins & Villacorta, P.A.  
501 East Tennessee Street  
Suite B  
Post Office Drawer 1657  
Tallahassee, Florida 32302  
Tel. (904) 222-1534  
Fax. (904) 222-1689  
Attys. for Intermedia

Patricia Kurlin  
Intermedia Comm., Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309  
(813) 829-0011

Peter M. Dunbar, Esq.  
Robert S. Cohen, Esq.  
Pennington, Culpepper, Moore,  
Wilkinson, Dunbar &  
Dunlap, P.A.  
215 South Monroe Street  
2nd Floor  
Post Office Box 10095  
Tallahassee, FL 32302  
(904) 222-3533

Sue E. Weiske, Esq.  
Time Warner Communications  
160 Inverness Drive West  
2nd Floor North  
Englewood, Colorado 80112  
(303) 799-5513

Tracy Hatch, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(904) 425-6364

Marsha E. Rule, Esq.  
c/o Doris M. Franklin  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301

Andrew O. Isar  
Director - Industry Relations  
Telecomm. Resellers Assoc.  
4312 92nd Avenue, N.W.  
P.O. Box 2461  
Gig Harbor, WA 98335-4461  
(206) 265-3910

Richard M. Rindler  
Swindler & Berlin, Chartered  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007  
Tel. (202) 424-7771  
Fax. (202) 424-7645

Kenneth A. Hoffman, Esq.  
William B. Willingham, Esq.  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
215 South Monroe Street  
Suite 420  
Tallahassee, FL 32301-1841  
(850) 681-6788

Mr. Paul Kouroupas  
TCG-Washington  
2 Lafayette Centre  
1133 Twenty First Street, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 739-0030

Laura L. Wilson  
Vice President  
Regulatory Affairs  
Florida Cable Telecomm. Assoc.  
310 North Monroe Street  
Tallahassee, FL 32301  
Tel. (904) 681-1990  
Fax. (904) 681-9676

*J. Phillip Carver*  
J. Phillip Carver

# Attachment A

## FPSC DOCKET 960786-TL DOCUMENTS FILED IN RESPONSE TO SUBPOENA

### Explanation for Proprietary Information

These documents contain proprietary and confidential business information. This information is customer specific proprietary confidential information. BellSouth is prohibited from disclosing this information by Section 364.24, of the Florida Statutes without the customer's permission. The information was provided to the FPSC Staff on July 31, 1997 pursuant to a Subpoena Duces Tecum without deposition issued by the Florida Public Service Commission on July 24, 1997. This information details the numbers and types and, in some cases, the termination location of services purchased from BellSouth.

This information is valuable, it is used by BellSouth and its customers in conducting their 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>ITEM / PAGE NO.</u>	<u>LINE/COLUMN NUMBER / NAME</u>
Item 31 / 1	Lines 14-23.
2	Lines 1, 13, 21, 31.
3	Lines 1, 9, 16, 25
5 & 6	Columns "ACNACust" and "Company Name"
8	Column ACNA and Company
9-12	Column CXR and Area Total
Item 43 / 2-5	Column resh_data and Company Name

**ITEM / PAGE NO.**

**LINE/COLUMN NUMBER / NAME**

Item 53 / 1

Lines 14-16

Item 59 / 1

Lines 10-16

Item 62 / 1

Lines 12-17

Item 66 / 1

Lines 11-13

Item 68

Attachment B / 1

Column "LEC Name"

Attachment C / 1-39

Column "Carrier"

Item 98 / 1

Lines 25-32