

ORIGINAL

Legal Department

NANCY B. WHITE
Assistant General Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
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October 27, 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 Nos. 970172-TP and 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.

Sincerely,

Nancy B. White
(ps)

Nancy B. White

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

Enclosures
/mf

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

RECEIVED & FILED
FPCO-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
11090 OCT 27 97
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI
Telecommunications Corporation
for an order requiring BellSouth
Telecommunications, Inc. to remove
its deregulated payphone investment
and associated expenses from its
intrastate operations and reduce
the Carrier Common Line rate
element of its intrastate switched
access charges by approximately
\$36.5 million as required by the
Federal Telecommunications Act
of 1996.

Docket No. 970172-TP

In re: Establishment of
intrastate implementation
requirement governing
federally mandated
deregulation of local
exchange company payphones.

Docket No. 970281-TL

Date Filed: October 27, 1997

**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. In response to Staff's First Request for Production of Documents, BellSouth filed certain information in this docket. At the same time, BellSouth filed its Notice of intent to Request Confidential Classification.

2. 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.

DOCUMENT NUMBER-DATE
11090 OCT 27 97
FPSC-RECORDS/REPORTING

3. 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.

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

5. 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.

6. 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.

7. 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.


8. 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.


9. 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 27th day of October, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.


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J. PHILLIP CARVER
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Atlanta, Georgia 30375
(404) 335-0711

CERTIFICATE OF SERVICE
DOCKET NO. 970281-TL , 970172-TP and 970173-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U. S. Mail this 27th day of October, 1997 to the following:

Richard D. Melson, Esq.
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
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Live Oak, FL 32080

Ms. Laurie A. Maffett
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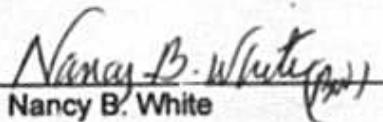
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Port St. Joe, FL 32456
1-800-441-4406

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Mr. Thomas M. McCabe
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Quincy, FL 32351-2310
(850) 875-2111

Mr. John H. Vaughan
St. Joseph Telephone Company
502 5th Street
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Nancy B. White

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Angela B. Creen
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125 South Gadsden Street
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Tallahassee, FL 32301-1525
Tel. No. (904) 222-5050
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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>
5	Column A, Lines 10, 11, 19, 20 All under Columns B, C, D, E, F, G, H	A
7	Line 6, Cols. B-E, H,I	A
8	Lines 112-149, 152,153,155, Cols. D,F,H	A
9	Lines 12-50, Cols. D,F,H	A
10	Lines 62-99, Cols. D,F,H	A
11	Lines 157,159-160, Cols F,H	A
12	Lines 112-149, 152,153,155, Cols. D,F,H	A
13	Lines 12-50, Cols. D,F,H	A
14	Lines 62-99, Cols. D,F,H	A
15	Lines 157,159-160, Cols F,H	A
16	Lines 112-149, 152,153,155, Cols. D,F,H	A
17	Lines 12-50, Cols. D,F,H	A
18	Lines 62-99, Cols. D,F,H	A
19	Lines 157,159-160, Cols F,H	A
20	Lines 112-149, 152,153,155, Cols. D,F,H	A
21	Lines 12-50, Cols. D,F,H	A
22	Lines 62-99, Cols. D,F,H	A
23	Lines 157,159-160, Cols F,H	A
24	Lines 3-35, Cols. F,H	A
25	Lines 3-35, Cols. F,H	A
26	Lines 3-35, Cols. F,H	A
27	Lines 3-35, Cols. F,H	A
28	Lines 9,10,11,24,25,26,39,40,41,54,55,56, Col. J Lines 14,15,16,21,28,29,30,31,36,44,45,46, 51,58,59,60,61,66, Col. J	B A
29	Lines 9,10,11,24,25,26, Col. J Lines 14,15,16,21,28,29,30,31,36, Col. J	B A
30	Lines 11,12,14,19,20,22,27,28,30,35,36,38, 43,44,46,51,52,54, Col. J Lines 9,10,17,18,25,26,33,34,41,42,49,50, Col. J	A B
31	Lines 14,15,16,17,18,21, Col. J Lines 22-25, Col. J	B A
32	Lines 7,8,10,11,19-21, Cols. A-D	A
38	Lines 7-51,56-58, Cols D,G	A
39	Lines 7-72, Cols. C,E	A
45	Lines 9,10, Col. J	B

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46	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35, Col. J	B
47	Lines 53,55,57,59, Col. J	B
48	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35,37,39,41,43, Col. J	B
49	Lines 5,7,9,11,13,15,17,19,21,23,25,27,29, 31,33,35, Col. J	B
50	Lines 1-8, 11-14, 19, 25, 27-29, Cols. B-G	B
51	Lines 1-8, 11-14, 19, 25-29, Cols. B-E	B
53	Lines 6-7, Col. C	A
55	Lines 26-38, Col. C	A
56	Lines 6,9,11,16-17, 23-37, 41-43, Col. C	A
59	Columns A,B,C,G, Lines 1,3	A
59	Columns A,B,C,D,F,G, Lines 2,4	A
59	Columns A,C,D,F,G, Lines 5	A
60	Column A, Lines 2,4	A
61	Column A, Lines 2,4,14-15,20,23-24	A
62	Column A, Lines 2,4	A
63	Column A, Lines 1,3,6,9	A
63	Column B, Line 13	A
63	Column C, Line 15	A
63	Columns B,C, Line 16	A
63	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
63	Column A, Lines 35,37,39	A
64	Column A, Lines 1,3,6,9	A
64	Column B, Line 13	A
64	Column C, Line 15	A
64	Columns B,C, Line 16	A
64	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
64	Column A, Lines 35,37,39	A
65	Column A, Lines 2-5	A
65	Column A, Lines 8-10	B
65	Column A, Lines 13,14	A
65	Column A, Lines 18-22	B
65	Column A, Lines 24-26	A
65	Column A, Lines 29-30,34-35	B
65	Column A, Line 39	A
66	Column A, Lines 3-4	B
66	Column A, Line 10	A
67	Column A, Lines 3,6	A
67	Column A, Lines 11,16-17	B
68	Column A, Lines 3,8,10	A
69	Column A, Lines 4,9,11,17,22,24,27	A

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70	Column A, Lines 3,6,9,16,18,23,27,29	A
71	Column A, Lines 2-4,14-17,20	A
72	Column A, Lines 4-7,11,14-16,19,21,23,26	A
73	Column A, Line 2	B
73	Column A, Line 6	A
73	Column A, Lines 9-15,18-22	B
73	Column A, Line 28	A
73	Column A, Lines 31-33	B
75	Column A, Lines 3-6,8-10,13-17,19-20	B
75	Column A, Lines 22-23	A
75	Column A, Lines 26,28-29	B
75	Column A, Line 30	A
75	Column A, Line 42	B
76	Column A, Lines 56,60,65,91-93,96-98	A
77	Column A, Lines 2,4	A
78	Column A, Lines 2,4,10,13,16,19-20	A
79	Column A, Lines 2,4	A
80	Column A, Lines 1,3,6,9	A
80	Column B, Line 13	A
80	Column C, Line 15	A
80	Columns B,C, Line 16	A
80	Columns A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
80	Column A, Lines 35,37,39	A
81	Column A, Lines 1,3,6,9	A
81	Column B, Line 13	A
81	Column C, Line 15	A
81	Column B,C, Line 16	A
81	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
81	Column A, Lines 35,37,39	A
82	Column A, Lines 2-5	A
82	Column A, Lines 8-10	B
82	Column A, Lines 13,14	A
82	Column A, Lines 18-22	B
82	Column A, Lines 24-26	A
82	Column A, Lines 29-30,34-35	B
82	Column A, Line 39	A
83	Column A, Lines 3-6	B
83	Column A, Line 7	A
83	Column A, Line 9	B
83	Column A, Lines 10,11,13,20	A
84	Column A, Lines 3,6	A
84	Column A, Lines 11,16-17	B

85	Column A, Lines 3,8,10	A
86	Column A, Lines 4,9,11,17,22,25,27	A
87	Column A, Lines 3,6,9,16,18,23,27,29	A
88	Column A, Lines 4-7,11,14-15,17,19,21,23,26	A
89	Column A, Lines 2-4,14-17,20	A
90	Column A, Line 2	B
90	Column A, Line 6	A
90	Column A, Line 9-15,18-22	B
90	Column A, Line 28	A
90	Column A, Line 31-33	B
92	Column A, Line 3-6,8-10,13-17,19-22	B
92	Column A, Line 24-25	A
92	Column A, Line 28,30-31	B
92	Column A, Line 32	A
92	Column A, Line 44-45	B
93	Column A, Line 56,60,65,91-93,96-98	B
95	Line 1, Cols. B-F	A
96-97	All under Col. B	A
98-99	All under Cols. C-F, H-I, L	A
100-101	All under Cols. C-Q	A
102	Lines 1-22, All under Cols. D-E	B
	Lines 24-33, All under Cols. D-E	A
	Lines 37-52, All under Cols. D-E	B
103	All under Cols. D-E	B
104	All under Cols. D-G	A
105	All under Col. D	A
106	All under Cols. D-F	A
107-120	All under Col. D	B
	Lines 1-10, All under Col. C	B
121-143	All under Col. D	A
145	Lines 1-9, Cols. A,D,F	A
	Lines 12-19 Col. F	A

REQUEST FOR CONFIDENTIAL CLASSIFICATION

ATTACHMENT A

EPSC DOCKET 970281-TL

PAYPHONE SERVICES COST STUDIES

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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.

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3	Ln 3, 4, 10, 17, 19, 20, 21, 22 Col D	A
3	Ln 8, Col D	B
4	Ln 2, 3, 7, 10, 13, 16, 19 Col D	A
5	Ln 26, 27, 29, 36, 40, 42, 44 Col D	A
6	Ln 50, 51, 54, 59, 60, 61	A
13	Ln 12, 13	A
17	Ln 11, 12, 14	B
	1, 4, 6, 9, 16, 21, 24, 26, 29	A
18	Ln 1	A
20	Ln 1, 4, 6, 9, 11, 14, 39, 43, 45	A
21	Ln 1, 4, 11	A
	Ln 6, 7, 9	B
22	Ln 1, 4, 16, 18, 19, 22, 24	A
	Ln 6, 7, 9, 11, 12, 14	B
23	Ln 1, 4, 6, 8, 13, 16, 18, 21, 23, 26, 28, 31, 34	A
24	Ln 1, 4, 6, 9, 11, 14, 16, 19, 21, 24, 26, 29, 31, 34, 36, 39, 41, 44, 46, 47, 48	A
25	Ln 2	B
	Ln 4, 5, 7, 9, 11, 13	A
26	Ln 1, 4, 6, 9, 12	A
27	Ln 1-7, 10, 16, 19, 20, 21, 23-25, 27, 31	A
28	Ln 9, 10, 11, 12	A
29	Ln 15, 16	A

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30	Ln 3, 6, 13, 17, 20, 22, 25, 27, 29, 33-46	A
30	Ln 8, 9, 11	B
31	Ln 47, 50, 52, 56, 59, 61, 63, 66	A
32	Ln 3, 6, 13, 17, 20, 22, 25, 27, 29, 33-46	A
	Ln 8, 9, 11	B
33	Ln 47, 50, 52, 56, 59, 61, 63, 66	A

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7	Line 6, Cols. B-E, H,I	A
8	Lines 112-149, 152,153,155, Cols. D,F,H	A
9	Lines 12-50, Cols. D,F,H	A
10	Lines 62-99, Cols. D,F,H	A
11	Lines 157,159-160, Cols F,H	A
12	Lines 112-149, 152,153,155, Cols. D,F,H	A
13	Lines 12-50, Cols. D,F,H	A
14	Lines 62-99, Cols. D,F,H	A
15	Lines 157,159-160, Cols F,H	A
16	Lines 112-149, 152,153,155, Cols. D,F,H	A
17	Lines 12-50, Cols. D,F,H	A
18	Lines 62-99, Cols. D,F,H	A
19	Lines 157,159-160, Cols F,H	A
20	Lines 112-149, 152,153,155, Cols. D,F,H	A
21	Lines 12-50, Cols. D,F,H	A
22	Lines 62-99, Cols. D,F,H	A
23	Lines 157,159-160, Cols F,H	A
25	Column A, Lines 2,4	A
26	Column A, Lines 2,4,6,14,15,20,23,24	A
27	Column A, Lines 3-6,8-10,13-17,19-20	B
27	Column A, Lines 22-23	A
27	Column A Lines 26,28-29	B
27	Column A, Line 30	A
27	Column A, Line 42	B
28	Column A, Lines 56,60,65,91-93,96,98	A
29	Column A, Lines 2,4	A
30	Column A, Lines 1,3,6,9	A
30	Column B, Line 13	A
30	Column C, Line 15	A
30	Column B,C, Line 16	A
30	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
30	Column A, Lines 35,37,39	A

31	Column A, Lines 1,3,6,9	A
31	Column B, Line 13	A
31	Column C, Line 15	A
31	Column B,C, Line 16	A
31	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
31	Column A, Lines 35,37,39	A
32	Column A, Lines 2-5	A
32	Column A, Lines 8-10	B
32	Column A, Lines 13,14	A
32	Column A, Lines 18-22	B
32	Column A, Lines 24-26	A
32	Column A, Lines 29-30,34-35	B
32	Column A, Line 39	A
33	Column A, Lines 3-4	B
33	Column A, Line 10	A
34	Column A, Lines 3,6	A
34	Column A, Lines 11,16-17	B
35	Column A, Lines 3,8,10	A
36	Column A, Lines 4,9,11,17,22,24,27	A
37	Column A, Lines 3,6,9,14,16,18,23,25,27,29	A
38	Column A, Lines 2-4,14-17,20	A
39	Column A, Lines 4-7,11,14-16,19,21,23,26	A
40	Column A, Lines 2,4-5	B
40	Column A, Line 6	A
40	Column A, Line 8	B
40	Column A, Line 10	A
40	Column A, Lines 12-13	B
40	Column A, Lines 14-15,21,27,30,32,34	A
42	Column A, Lines 2,4	A
43	Column A, Lines 2,4,10,13,16,19-20	A
44	Column A, Lines 3-6,8-10,13-17,19-22	B
44	Column A, Lines 24-25	A
44	Column A, Lines 28,30-31	B
44	Column A, Line 32	A
44	Column A, Lines 44-45	B
45	Column A, Lines 56,60,65,91-93,96,98	A
46	Column A, Lines 2,4	A
47	Column A, Lines 1,3,6,9	A

47	Column B, Line 13	A
47	Column C, Line 15	A
47	Column B,C, Line 16	A
47	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
47	Column A, Lines 35,37,39	A
48	Column A, Lines 1,3,6,9	A
48	Column B, Line 13	A
48	Column C, Line 15	A
48	Column B,C, Line 16	A
48	Column A,B,C, Lines 17,20,22,24-25,28,30,33-34	A
48	Column A, Lines 35,37,39	A
49	Column A, Lines 2-5	A
49	Column A, Lines 8-10	B
49	Column A, Lines 13,14	A
49	Column A, Lines 18-22	B
49	Column A, Lines 24-26	A
49	Column A, Lines 29-30,34-35	B
49	Column A, Line 39	A
50	Column A, Lines 3-6	B
50	Column A, Line 7	A
50	Column A, Line 9	B
50	Column A, Lines 10,11,13,20	A
51	Column A, Lines 3,6	A
51	Column A, Lines 11,16-17	B
52	Column A, Lines 3,8,10	A
53	Column A, Lines 4,9,11,17,22,24,27	A
54	Column A, Lines 3,6,9,14,16,18,23,25,27,29	A
55	Column A, Lines 4-7,11,14-15,17,19,21,23,26	A
56	Column A, Lines 2-4,14-17,20	A
57	Column A, Lines 2,4-5	B
57	Column A, Line 6	A
57	Column A, Line 8	B
57	Column A, Line 10	A
57	Column A, Lines 12-13	B
57	Column A, Lines 14-15,21,27,30,32,34	A
60	Line 1, Cols. C-G	A
61-62	All under Col. B	A
63-64	All under Cols. C-F, H-I, L	A

65-66	All under Cols. C-Q	A
67	Lines 1-22, All under Cols. D-E	B
	Lines 24-33, All under Cols. D-E	A
	Lines 37-52, All under Cols. D-E	B
68	All under Cols. D-E	B
69	All under Cols. D-G	A
70	All under Cols. D-F	A
71	All under Col. D	A
72-85	All under Col. D	B
	Lines 1-10, All under Col. C	B
86-108	All under Col. D	A
110	Lines 1-9, Cols. A,D,F	A
	Lines 12-19 Col. F	A