

CERTIFICATE OF SERVICE
DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP

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

Federal Express this 4th day of December, 1997 to the following:

Martha Brown, Esq.
Monica Barone, Esq.
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6187
(850) 413-6250

Tracy Hatch, Esq.
Michael W. Tye, Esq.
101 N. Monroe Street
Suite 700
Tallahassee, Florida 32301
Attys. for AT&T
Tel. (850) 425-6364
Fax. (850) 425-6361

Mark A. Logan, Esq.
Brian D. Ballard, Esq.
Bryant, Miller & Olive, P.A.
201 S. Monroe Street
Tallahassee, Florida 32301
Attys. for AT&T
Tel. (850) 222-8611
Fax. (850) 224-1544

Richard D. Melson, Esq.
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, Florida 32314
Tel. (850) 222-7500
Fax. (850) 224-8551
Atty. for MCI/metro

Floyd R. Self, Esq.
Messer, Caparello, Madsen,
Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
Tel. (850) 222-0720
Fax. (850) 224-4359

Mr. Brian Sulmonetti
Director, Regulatory Affairs
WorldCom, Inc.
1515 South Federal Highway, Suite 400
Boca Raton, FL 33432
Tel. (561) 750-2940
Fax. (561) 750-2629

Norman H. Horton, Jr.
Messer, Caparello & Self, P.A.
215 S. Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. (850) 222-0720

James C. Falvey
American Comm. Svcs., Inc.
131 National Business Parkway
Suite 100
Annapolis Junction, MD 20701

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs,
Odom & Ervin
305 South Gadsden Street
Post Office Drawer 1170
Tallahassee, FL 32302

Mr. Thomas K. Bond
MCI Metro Access Transmission
Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342

Brad Mutschelknaus
Kelley Drye & Warren, L.L.P.
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036


Bennett L. Ross (BLL)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T) Docket No. 960833-TP
 Communications of the Southern)
 States, Inc., and MCI) Docket No. 960846-TP
 Telecommunications Corporation,)
 MCI Metro Access Transmission)
 Services, Inc., for arbitration)
 of certain terms and conditions)
 of a proposed agreement with)
 BellSouth Telecommunications,)
 Inc. concerning interconnection)
 and resale under the)
 Telecommunications Act of 1996)

In the matter of) Docket No. 960757-TP
)
 MFS Communications Company, Inc.)
)
 Petition for Arbitration Pursuant)
 to 47 U.S.C. § 252(b) of)
 Interconnection Rates, Terms, and)
 Conditions with)
)
 BellSouth Telecommunications, Inc.)

In the Matter of) Docket No. 960916-TP
 Petition by American)
 Communications Services, Inc.)
 and American Communications)
 Services of Jacksonville, Inc.)
 for Arbitration with BellSouth)
 Telecommunications, Inc.)
 pursuant to the)
 Telecommunications Act of 1996)

In re: Petition by MCI Metro Access) Docket No. 971140-TP
 Transmission Services, Inc., to Set)
 Non-Recurring Charges for)
 Combination of Network Elements)
 to Set Non-Recurring Charges for)
 Combination of Network Elements)
 with BellSouth Telecommunications, Inc.) Filed: December 4, 1997

DOCUMENT NUMBER-DATE
 12417 DEC-4 97
 FPSC-RECORDS/REPORTING

**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. On November 13, 1997, Exhibit P-1 of the Direct Panel Testimony of D. Daonne Caldwell and William P. Zarakas was filed along with a Notice of Intent to Request Confidential Classification for the subject information on this cost study Exhibit.

2. BellSouth is filing a Request for Confidential Classification for the subject information because Exhibit P-1 contains confidential and proprietary business information.

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 as Attachment B is two copies of the requested documents with the confidential information deleted.

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

6. The requested cost study exhibit contains information considered to be confidential and proprietary to BellSouth, and includes

information containing, among other things, cost, vendor specific and other company proprietary information. It contains competitively sensitive information that reflects specific areas of market growth. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. The market growth information is valuable to competitors and potential competitors in formulating plans for entry, 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. 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.

8. 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 4th day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.


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
BENNETT L. ROSS
675 W. Peachtree Street
Suite 4300
Atlanta, Georgia 30375
(404) 335-0711

ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED AS ATTACHMENTS TO THE DIRECT TESTIMONY OF DAONNE CALDWELL ON NOVEMBER 13, 1997 IN DOCKETS 960833-TP, 969846-TP, 90757-TP, 971140-TP AND 960916-TP

Explanation of Proprietary Information

1. 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.

2. 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. The second category of vendor specific information constituting a trade secret is that which is proprietary to Bellcore. Contained within the subject protected information is information from the SCIS (Switching Cost Information System) model developed by Bellcore. There is also information in the SNC (Switched Network Calculator) model of BellSouth that is derived from the SCIS. The SCIS is a model the Bellcore considers to be proprietary, and BellSouth is contractually bound by an agreement with Bellcore to treat it as such. This model incorporates information given to Bellcore by switch vendors, as well as programming algorithms developed by Bellcore to translate the switch vendor information into cost profiles for various applications. This computer model has been developed by Bellcore over the course of more than a decade at a cost of tens of millions of dollars. If any of this information was made publicly available, the value of Bellcore's model and the related services it provides would decrease dramatically. 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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| <u>ITEM</u> | <u>BASIS FOR REQUEST</u> | |
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| PAGE 0571 | COLUMN A, B, G, C, D | 1 |
| PAGE 0572 | COLUMN A, B, G, C, D | 1 |
| PAGE 0573 | COLUMN "5ESS", "DMS-100", "MELDED COST" | 1 |
| PAGE 0574 | COLUMN MONTHLY COST | 1 |
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| PAGE 0578 | LINES 1, 2, 3, 4, 6, 8, 9, 10, 11 COLUMN TOTAL LINES, LINES PER OFFICE | 1 |
| PAGE 0579 | COLUMN TOTAL LINES, LINES PER OFFICE | 2 |
| PAGE 0580 | COLUMN TOTAL LINES, LINES PER OFFICE | 2 |
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ELECTRONIC FILES

BASIS FOR REQUEST

WORKSHEET INPUT FILES:

| | |
|--------------|---|
| 4WA.xls | 1 |
| FEATURES.xls | 1 |
| FLPHCOLL.XLS | 1 |
| FLVCOLL.XLS | 1 |

OTHER FILES:

| | | |
|------------|-----------|---|
| SECTION 3 | ALL FILES | 2 |
| APPENDIX H | ALL FILES | 2 |

OTHER ITEMS

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APPENDIX H:

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| Bellcore SCIS CD AND USER MANUALS | 2 |
|-----------------------------------|---|