

BENNETT L. ROSS
General Attorney

BellSouth Telecommunications, Inc.
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January 9, 1998

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

RE: **Docket Nos. 960833-TP/960846-TP/960757-TP
960916-TP and 971140-TP**

Dear Ms. Bayo:

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 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,

Bennett L. Ross (ke)

Bennett L. Ross

Enclosures

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

RECEIVED
[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00498 JAN-98

FPSC-RECORDS/REPORTING

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: January 9, 1998
)

DOCUMENT NUMBER-DATE

00498 JAN-98

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 December 22, 1997, BellSouth filed a Notice of Intent to Request Confidential Classification for certain information requested in the Staff's Fourth Request for Production (Item No. 52a and Item No. 59) as well as the Staff's Fourth Set of Interrogatories (Item No. 71b).

2. BellSouth is filing a Request for Confidential Classification for the subject information because the information contained in the responsive documents is proprietary to BellSouth and includes commercially sensitive information containing, among other things, the cost associated with BellSouth's retail operations and vendor specific pricing 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 are 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 documents responsive to the Staff's discovery requests contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, cost, vendor specific and other company proprietary information. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. 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 9th day of January, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)

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NANCY B. WHITE

c/o Nancy Sims

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105935

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 9th day of January, 1998 to the following:

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(+) Protective/Non-Disclosure
Agreement


Bennett L. Ross

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Staff's 4th Document Request
Request for Confidential Classification
Page 1
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 4th REQUEST FOR DOCUMENTS ON DECEMBER 19, 1997 IN DOCKETS 960833-TP, 960846-TP, 960757-TP, 960916-TP AND 971140-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 for equipment or services 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

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Staff's 4th Document Request
Request for Confidential Classification
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<u>ITEM</u>	<u>LOCATION</u>	<u>BASIS FOR REQUEST</u>
ITEM 52		
	Lucent Technologies SONET Products Configuration Spreadsheet	
	Attachment No. 1	
Page 1	Column - BST Unit Price	2
ITEM 59		
	Nonrecurring Line Connection Charges Cost	
Page 1	Column Residence thru Business; Line A thru C	1
Page 2	Column Residence; Line 1A thru 1C	1
Page 2	Column Business; Line 2A thru 2C	1
Page 3	Column Residence; Line 1A thru 1C	1
Page 3	Column Business; Line 2A thru 2C	1
Page 5	Column 3, 5, 7; Line 4A, 4D, 4E, 4F, 4G, 4I, total item 4, 5A, 5D, 5E, 5F, 5G, 5I, total item 5, 6A, 6D, 6E, 6F, 6G, 6I total item 6	1
Page 6	Column 3, 5, 7; Line 7A, 7D, 7E, 7F, 7G, 7I, total item 7, 8A, 8D, 8E, 8F, 8G, 8I, total item 8, 9A, 9D, 9E, 9F, 9G, 9I, total item 9	1
Page 7	Column 3, 5, 7; Line 10A, 10D, 10E, 10F, 10G, 10I total item 10	1
Page 9	Column 6, 8, 9; Line 1 thru 10	1
Page 11	Column D thru G, Line 9 thru 27	1
Page 11	Column ADDITIONAL LINE; Line 33 thru 35	1
Page 12	Column D thru F; Line 10 thru 38	1
Page 13	Column D thru G; Line 8 thru 25	1
Page 13	Column ADDITIONAL LINE; Line 33 thru 35	1
Page 14	Column D thru F; Line 10 thru 29	1
Page 17	Column RESIDENCE, BUSINESS; Line 7A thru 8E	1
Page 17	Column RESIDENCE, BUSINESS, Line 10A thru 10E	1
Page 18	Column RESIDENCE, BUSINESS; Line 1A thru 5E	1
Page 18	Line 6	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Staff's 4th Document Request
Request for Confidential Classification
Page 3
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<u>ITEM</u>	<u>LOCATION</u>	<u>BASIS FOR REQUEST</u>
Page 18	Column RESIDENCE, BUSINESS; Line 9A thru 9E	1
Page 19	Column 2-6, 7-30, 31-xxx; Line 7A thru 8D	1
Page 19	Column 2-6, 7-30, 31-xxx; Line 10A thru 10D	1
Page 20	Column 2-6, 7-30, 31-xxx; Line 1A thru 6D	1
Page 20	Line 7	1
Page 20	Column 2-6, 7-30, 31-xxx; Line 9A thru 9D	1
Page 25	Column RESIDENCE, BUSINESS; Line 1A thru 1E	1
Page 25	Column 7-6, 7-30, 31-xxx; Line 2A thru 2D	1
Page 26	Column AMOUNT; Line 32	1
Page 27	Column AMOUNT; Line 1A thru 5B	1
Page 28	Column AMOUNT; Line 1A thru 2A	1
Page 28	Column AMOUNT; Line 4A thru 5B	1
Page 31	Column RESIDENCE, BUSINESS; Line 8 thru 13B	1
Page 32	Column RESIDENCE, BUSINESS; Line 14 thru 29B	1
Page 33	Column RESIDENCE, BUSINESS; Line 32A , 32B	1
Page 33	Column RESIDENCE, BUSINESS; Line 34A, 34B	1
Page 34	Column RESIDENCE, BUSINESS; Line 1A, 1D	1
Page 34	Column RESIDENCE, BUSINESS; Line 4A, 4D	1
Page 34	Column RESIDENCE, BUSINESS; Line 6A, 6D	1
Page 34	Column RESIDENCE, BUSINESS; Line 8A, 8D	1
Page 35	Column 2-6, 7-30, 31-xxx; Line 2A thru 14B	1
Page 36	Column 2-6, 7-30, 31-xxx; Line 1A thru 2B	1
Page 36	Column 2-6, 7-30, 31-xxx; Line 4A thru 6D	1
Page 37	Column 2-6, 7-30, 31-xxx; Line 1A, 1D	1
Page 37	Column 2-6, 7-30, 31-xxx; Line 4A, 4D	1
Page 37	Column 2-6, 7-30, 31-xxx; Line 6A, 6D	1
Page 37	Column 2-6, 7-30, 31-xxx; Line 8A, 8D	1
Page 38	Column RESIDENCE, BUSINESS; Line 7 thru 12D	1
Page 39	Column RESIDENCE, BUSINESS; Line 13 thru 20D	1
Page 40	Column RESIDENCE, BUSINESS; Line 25A, 25D	1
Page 40	Column RESIDENCE, BUSINESS; Line 27A, 27D	1
Page 41	Column RESIDENCE, BUSINESS; Line 1A, 1D	1
Page 41	Column RESIDENCE, BUSINESS; Line 4A, 4D	1
Page 41	Column RESIDENCE, BUSINESS; Line 6A, 6D	1
Page 41	Column RESIDENCE, BUSINESS; Line 8A, 8D	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Staff's 4th Document Request
Request for Confidential Classification
Page 4
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<u>ITEM</u>	<u>LOCATION</u>	<u>BASIS FOR REQUEST</u>
Page 42	Column 2-6, 7-30, 31-xxx; Line 8A, 11B	1
Page 43	Column 2-6, 7-30, 31-xxx; Line 12A thru 20D	1
Page 44	Column 2-6, 7-30, 31-xxx; Line 25A, D	1
Page 44	Column 2-6, 7-30, 31-xxx; Line 27A, D	1
Page 53	Column RESIDENCE, BUSINESS; Line 1A, 1D	1
Page 53	Column RESIDENCE, BUSINESS, Line 4A, 4D	1
Page 53	Column RESIDENCE, BUSINESS, Line 6A, 6D	1
Page 53	Column RESIDENCE, BUSINESS, Line 8A, 8D	1
Page 54	Column 2-6, 7-30, 31-xxx; Line 2A thru 8D	1
Page 55	Column 2-6, 7-30, 31-xxx; Line 9A thru 13D	1
Page 55	Column 2-6, 7-30, 31-xxx; Line 16A, 16D	1
Page 56	Column 2-6, 7-30, 31-xxx; Line 18A, 18D	1
Page 57	Column 2-6, 7-30, 31-xxx; Line 1A, 1D	1
Page 57	Column 2-6, 7-30, 31-xxx; Line 4A, 4D	1
Page 57	Column 2-6, 7-30, 31-xxx; Line 6A, 6D	1
Page 57	Column 2-6, 7-30, 31-xxx; Line 8A, 8D	1
Page 58	Column RESIDENCE, BUSINESS; Line 1A thru 6B	1
Page 59	Column 2-6, 7-30, 31-xxx; Line 1A thru 6B	1
Page 60	Column AMOUNT; Line 1A thru 2D	1
Page 61	Column AMOUNT; Line 1A thru 2B	1
Page 61	Column AMOUNT; Line 3A thru 4B	1
Page 45	Column 2-6, 7-30, 31-xxx; Line 1A, 1D	1
Page 45	Column 2-6, 7-30, 31-xxx; Line 4A, 4D	1
Page 45	Column 2-6, 7-30, 31-xxx; Line 6A, 6D	1
Page 45	Column 2-6, 7-30, 31-xxx; Line 8A, 8D	1
Page 46	Column RESIDENCE, BUSINESS; Line 1A, 1D	1
Page 46	Column RESIDENCE, BUSINESS; Line 4A, 4D	1
Page 46	Column RESIDENCE, BUSINESS; Line 6A, 6D	1
Page 47	Column RESIDENCE, BUSINESS; Line 1A, 1D	1
Page 47	Column RESIDENCE, BUSINESS; Line 5A, 5D	1
Page 47	Column RESIDENCE, BUSINESS; Line 7A, 7D	1
Page 47	Column RESIDENCE, BUSINESS; Line 9A, 9D	1
Page 48	Column 2-6, 7-30, 31-xxx; Line 1A, 1D	1
Page 48	Column 2-6, 7-30, 31-xxx; Line 4A, 4D	1
Page 48	Column 2-6, 7-30, 31-xxx; Line 6A, 6D	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Staff's 4th Document Request
Request for Confidential Classification
Page 5
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<u>ITEM</u>	<u>LOCATION</u>	<u>BASIS FOR REQUEST</u>
Page 49	Column 2-6, 7-30, 31-xxx; Line 1A, 1D	1
Page 49	Column 2-6, 7-30, 31-xxx; Line 5A, 5D	1
Page 49	Column 2-6, 7-30, 31-xxx; Line 6A, 6D	1
Page 49	Column 2-6, 7-30, 31-xxx; Line 9A, 9D	1
Page 50	Column RESIDENCE, BUSINESS; Line 1A thru 7D	1
Page 51	Column RESIDENCE, BUSINESS; Line 8A thru 12D	1
Page 51	Column RESIDENCE, BUSINESS; Line 15A, 15D	1
Page 52	Column RESIDENCE, BUSINESS; Line 17A, 17D	1

ITEM 71(b) Attachment 1

DS1 Price Calculator

Page 1	Column 4 - Material Price	Vendor Prices
Page 2	Column 3 - Result	Vendor Prices
Page 3	Column 3 - Result	Vendor Prices
Page 4	Column 3 - Result	Vendor Prices
Page 5	Column 3 - Result	Vendor Prices
Page 6	Column 3 - Result	Vendor Prices
Page 7	Column 3 - Result	Vendor Prices
Page 8	Column 3 - Result	Vendor Prices
Page 9	Column 3 - Result	Vendor Prices
Page 10	Column 2	Vendor Prices