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January 22, 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 (Cost Dockets)

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's Fifth Request for Production of Documents No. 62, 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,

*Nancy B. White*  
Nancy B. White (BW)

Enclosures

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

RECORDED  
FPSC BUREAU OF RECORDS

00351-98  
60820-98

DOCUMENT NUMBER-DATE

01219 JAN 22 1998

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 960833-TP, 960846-TP and 960757-TP**

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

Federal Express this 22nd day of January, 1998 to the following:

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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. )  
Filed: January 22, 1998

**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 January 7, 1998 Response and Objections to Staff's Fifth Request for Production of Documents were filed along with a Notice of Intent to Request Confidential Classification for the subject documents.

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01219 JAN 22 88

FPSC-RECORDS/REPORTING

2. BellSouth is filing a Request for Confidential Classification for the subject information because Request for Production No. 62 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 document contains information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, strategic planning information. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. 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 22nd day of January, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
ROBERT G. BEATTY

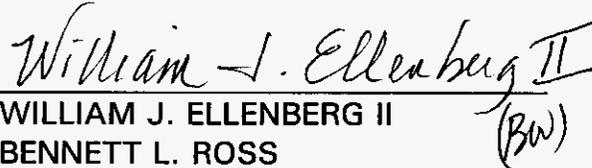
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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket 960833-TP  
Staff's 5th Document Request  
Request for Confidential Classification  
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### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 5th REQUEST FOR DOCUMENTS ON JANUARY 7, 1998 IN DOCKETS 960833-TP, 960846-TP, 960757-TP, 960916-TP**

#### **Explanation of Proprietary Information**

BellSouth objects to this interrogatory to the extent the information requested is proprietary. The information requested concerns strategic planning information for fiber deployment and the associated technology which would bring harm to BellSouth if publicly released. This information is treated as Proprietary and Confidential Business information by BellSouth. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know BellSouth's strategic plans for fiber deployment and the associated technology. It could influence BellSouth's ability to fairly conduct competitive bids for cable and equipment. This data is valuable to competitors and potential competitors in formulating strategic 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 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 5th Document Request  
Request for Confidential Classification  
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<u>ITEM</u>	<u>LOCATION</u>
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ITEM 62

Loop Technology Deployment Directives

RL: 96-09-026BT September 30, 1996

page 1 Lines 21-36

pages 4-42 and 44- 64

ReITec DISC\*S System ONU-12/24

RL: 97-03-027BT March 27, 1997

page 1 Lines 14-24

pages 3-4 and 7-9

Update to Fiber Distribution Deployment Directives

RL: 97-11-017BT (Undated draft)

page 1 Lines 12-32

pages 3-5

Update to Fiber Distribution Deployment Directives

RL: 97-11-017BT December 18, 1997

page 1 Lines 13-33

pages 2-4