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BellSouth Telecommunications, Inc.  
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February 10, 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 Confidential Classification for Staff's Third Set, Interrogatory No. 39 and Request for Production Nos. 41 and 42, 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 on the parties shown on the attached Certificate of Service.

Sincerely,

*Nancy B. White (nr)*

Nancy B. White

Enclosures

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

*Xref DNs 01063-98 + 01223-98*

DOCUMENT NUMBER-DATE

02078 FEB 10 88

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 10th day of February, 1998 to the following:

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

(+) Protective/Non-Disclosure  
Agreement

Nancy B. White (re)  
Nancy B. White

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: February 10, 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 November 24, 1997, the Staff of the Florida Public Service Commission ("Staff") served its Third Set of Interrogatories and Third Request for Production of Documents on BellSouth. On December 2, 1997, BellSouth filed its

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Objections to Staff's Third Request for Production and on December 9, 1997, BellSouth filed its Response and Objections to Staff's Third Request for Production. On January 13, 1998, Staff filed a Motion to Compel. As a result of discussions with Staff, BellSouth has agreed to provide a revised response to Interrogatory No. 39 and to allow Staff to inspect documents that may be responsive to Request for Production Nos. 41 and 42. On January 20, 1998, a Notice of Intent to Request Confidential Classification was filed for Staff's Third Interrogatory No. 39 and on January 22, 1998, a Notice of Intent to Request Confidential Classification was filed for Staff's Third Request for Production Nos. 41 and 42.

2. BellSouth is now filing a Request for Confidential Classification for the subject information because Interrogatory No. 39 and Request for Production Nos. 41 and 42 contain 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 documents contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, competitive business information and strategic planning and financial

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 10 day of February, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (KR)  
ROBERT G. BEATTY

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William J. Ellenberg II (KR)  
WILLIAM J. ELLENBERG II

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# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 960833-TP  
Staff's 3rd Interrogatories/Document Request  
Request for Confidential Classification  
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## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 3rd REQUEST FOR DOCUMENTS AND INTERROGATORIES ON JANUARY 20, 1998 IN DOCKETS 960833-TP, 960846-TP, 960757-TP

### Explanation of Proprietary Information

This information contains detailed financial and strategic information for BellSouth affiliated companies. This information is proprietary to those Companies and BellSouth Corporation, and BellSouth is not at liberty to publicly disclose the financial and strategic information contained in these documents. 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 or its affiliated Companies. 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.

### ITEM                      LOCATION

#### INTERROGATORY ITEM 39

Page 1                      Line #15

#### DOCUMENT REQUEST ITEMS 41 & 42

Page 2                      Lines 2-8 and columns A - F

Page 3                      Columns A-F and A-E

Page 4                      Columns A-C

Page 5                      Columns A-F