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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 an Audit Request for Non-recurring charges, 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
(Bul)
Nancy B. White

Enclosures

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

X-Vet DN 01145-98
DOCUMENT NUMBER-DATE
0208 | FEB 10 8
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 (+)
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Services, Inc.
780 Johnson Ferry Road
Suite 700
Atlanta, GA 30342

(+) Protective/Non-Disclosure
Agreement


Nancy B. White (BNW)

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 January 21, 1998, a audit exit conference report was issued for non-recurring charges. Staff has identified certain documents and information that it desires to include in its audit workpapers to support its audit in this docket.

DOCUMENT NUMBER-DATE

0208 | FEB 10 88

EPSC-RECORDS/REPORTING

2. Pursuant to Rule 25-22-006(3)(a) and (4), Florida Administrative Code, BellSouth is hereby filing its Request for Confidential Classification for certain portions of Staff's Audit Request for Non-recurring Charges. These documents contain numerous categories of proprietary confidential business information which will be discussed in detail hereafter.

3. Pursuant to Rule 25-22.006(4)(c), BellSouth has included three attachments with this filing:

4. Attachment A a listing of the location of the information designated by BellSouth as confidential.

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

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

7. The requested documents contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, customer specific and/or vendor specific information, strategic planning information and floor plans of BellSouth's central offices. 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.

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 10 day of February, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (Print)

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
FPSC Staff's Audit Report
Request for Confidential Classification
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S Audit Report ON JANUARY 20, 1998 IN DOCKETS 960833-TP, 960846-TP, 960757-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 customer specific information, and/or, 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.

3. This information is the floor plans of BellSouth central offices. These plans are considered to be proprietary and confidential business information. These offices have limited access and are the central focal point of telecommunications in their geographic location. Public disclosure of this information would impair BellSouth's ability to keep these offices and the communications network secure. 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.

4. 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
FPSC Staff's Audit Report
Request for Confidential Classification
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<u>ITEM</u>	<u>LOCATION</u>	<u>REASON</u>
ITEM		
16-2-8	pages p1-p4	3
16-2-9	pages p3 column 3, 4, 5	2
	p4 column 3, 4, 5	2
	p11 entire page	2
	p12 entire page	2
	p13 entire page	3
16-2-11	pages 1-57 entire floor plan	3
16-2-12	pages p3 line 19-26	3
	p4 lines 6-9	3
	p7 lines	3
	p8 lines 6-12	3
43-1 1-1	pages p3-p22 entire page	4
43-2-1	pages p2-p22 entire page	4