

ORIGINAL

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February 12, 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**

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. I would appreciate your filing this document 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

(BR)

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

Enclosures

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

RECORDED
INDEXED
FPSC BUREAU OF RECORDS

x-ref 01312-98
01343-98
DOCUMENT NUMBER-DATE

02-19-98 FEB 12 8

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.)	
)	
)	Filed: February 12, 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 14 and 15, 1998, the Staff of the Florida Public Service Commission ("Staff") deposed BellSouth witnesses Caldwell and Zarakas. The Staff asked the witnesses for a number of Late Filed Deposition Exhibits during this Deposition. On January 23, 1998, a Notice of Intent to Request Confidential

DOCUMENT NUMBER-DATE
02191 FEB 12 88
FPSC-RECORDS/REPORTING

Classification was filed for Caldwell/Zarakas Deposition Late Filed Exhibits 2, 3, 6 and 16.

2. BellSouth is now filing a Request for Confidential Classification for the subject information because Late Filed Deposition Exhibits 2, 3, 6 and 16 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, vendor specific prices, and material costs 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 12 day of February, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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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 12th day of February, 1998 to the following:

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(+) Protective/Non-Disclosure
Agreement


Bennett L. Ross *(Bul)*

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Caldwell/Zarakas Late Filed Exhibits 2, 3, 6, 16
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO
Caldwell/Zarakas Late Filed Exhibits 2, 3, 6, and 16 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.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Caldwell/Zarakas Late Filed Exhibits 2, 3, 6, 16
Request for Confidential Classification
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<u>ITEM</u>	<u>LOCATION</u>	<u>REASON</u>
ITEM		
INTERROGATORY		
Item 2	line 9, 10	2
Item 3		
Attachment 1	pages 1- 530	2
	page 2 lines 15-18, 22, 23, 31, 34	2
Item 6		
Attachment 1	page 1-13 columns Collocator, CUS SPEC	2
Item 16		
Attachment 1	pages 4, 10-12, 16, 17, 22, 23	1, 2
	pages 5, 14, 27 columns: MAT Price, TOT Price, Unit Price, Util Price	1, 2
	pages 6, 15, 26 Columns: Util Price, Total MAT Price	1, 2
	pages 7, 16, 25 Columns: MAT Price, WGT MAT Price, TOT	1, 2
	pages 12, 13, 29, 30 Column: BST Unit Price, Total	1, 2
	page 28 Column: Material Cost/Unit, Installed Cost	1, 2