

NANCY B. WHITE
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February 18, 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 Supplemental Late Filed Deposition No. 16 for D. Daonne Caldwell and William P. Zarakas, 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.

- 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

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,

Nancy B. White (ke)

Nancy B. White

X-ref DN01491-98
DOCUMENT NUMBER-DATE
02367 FEB 18 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.)	
)	
)	Filed: February 18, 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 28, 1998, a Notice of Intent to Request Confidential Classification was filed for Supplemental Late Filed Deposition No. 16 for D. Daonne Caldwell/William P. Zarakas

DOCUMENT NUMBER-DATE
02367 FEB 18 88
FPSC-RECORDS/REPORTING

2. BellSouth is now filing a Request for Confidential Classification for the subject information because Supplemental Late Filed Deposition Exhibit No. 16 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 documents contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, cost information and customer/vendor specific information. A more specific description of this information is contained in Attachment A. 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 18th 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 18th day of February, 1998 to the following:

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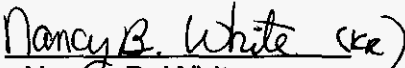
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(+) Protective/Non-Disclosure
Agreement


Nancy B. White

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Caldwell/Zarakas Supplemental Late Filed
Deposition Exhibit No 16
Request for Confidential Classification
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REQUEST FOR CONFIDENTIAL CLASSIFICATION Of Data Filed As Caldwell/Zarakas Supplemental Late Filed Deposition Exhibit No. 16 on January 28, 1998 IN DOCKETS 960833-TP, 960846-TP, 960757-TP, 971140- TP AND 960916-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 Supplemental Late Filed
Deposition Exhibit No 16
Request for Confidential Classification
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<u>PAGE NUMBER</u>	<u>COLUMN</u>	<u>LINE NUMBER</u>	<u>BASIS FOR REQUEST</u>
2		15-21	1,2
3	7		1,2
4	6		1,2
5	4-7		1,2
6-11	E & F		1,2
12	E		1,2
13-18	E & F		1,2
19	E		1,2
20-21	E & F		1,2
22	E		1,2
23-24	E & F		1,2
26	H & I		1,2
27	I - M		1,2
28	I - O		1,2
29	I & J		1,2
30	I & J		1,2
31	D	18-19	1,2
32	D	37	1,2
33	D & E	27	1,2
34	D & E	35	1,2
35	D	33	1,2
36	D	33	1,2
38	H & I		1,2
39	I, K, M & O		1,2
40	I, K, M & O		1,2
41	I & J	14-16	1,2
42	I & J	18-20	1,2
43	D & E	37	1,2
44	D & E	35	1,2
45	D	49	1,2
46	D	18 & 19	1,2
47	D & E	33	1,2
49	H & I		1,2
50	I, J, K, M, N & O		1,2
51-54	I - O		1,2
55-56	H - J		1,2
57	D	37	1,2
58	D	28	1,2
59	D	16	1,2
60	D	37	1,2

**BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
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<u>PAGE NUMBER</u>	<u>COLUMN</u>	<u>LINE NUMBER</u>	<u>BASIS FOR REQUEST</u>
61	D	49	1,2
62	D	33	1,2
63	D	28	1,2
64	D	35	1,2
65	D	49	1,2
66	D	33	1,2