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May 14, 1998

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Via Federal Express

Florida Public Service Commission
Division of Records and Reporting
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**Re: Ameritech Communications International, Inc.
Motion for Protective Order and Confidential Classification of
Response to Commission Data Requests -- Docket No. 960786-TL**

To Whom it May Concern:

Transmitted herewith on behalf of our client, Ameritech Communications International, Inc. ("ACII"), are an original and two (2) copies of its Response to the Data Requests propounded by the Florida Public Service Commission in its April 27, 1998 letter in the above-referenced docket. Also enclosed is an original and two (2) copies of the ACII's Motion for a Protective Order Requesting Confidential Treatment for its Response to Commission Data Requests and a Certificate of Service.

Please date-stamp the "Receipt" copy of these filings and return them in the enclosed, self-addressed, stamped envelope. Please refer all questions and correspondence regarding these filings directly to the undersigned.

Respectfully Submitted,



Glenn S. Richards
Jaqualin Friend Peterson

Counsel for Ameritech Communications International, Inc.

Enclosures

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

DOCKET NO. 960786-TL
RESPONSE OF AMERITECH COMMUNICATIONS INTERNATIONAL, INC.
TO DATA REQUESTS PROPOUNDED BY
THE FLORIDA PUBLIC SERVICE COMMISSION

1. Is BellSouth currently providing you with access to UNEs at any technically feasible point in accordance with the requirements of Section 251(c)(3) of the Telecommunications Act of 1996 and pursuant to 271(c)(2)(B)(ii) and applicable rules promulgated by the FCC and FPSC?
 - a. If yes, please list the following information:
 1. each element being provided by BellSouth,
 2. the point of interconnection being provided for each element,
 3. the rate being charged for each element,
 4. the reason(s) why any element requested from BellSouth was not provided; and
 5. the reason(s) why the point of interconnection requested from BellSouth was not provided.

RESPONSE: This response is being filed pursuant to a protective order.

2. Do you currently provide local exchange service in Florida either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from an incumbent local exchange company (ILEC) in Florida? If yes:
 - a. is it being provided solely to business customers, solely to residential customers, or both?
 - b. through the use of your facilities and UNE's purchased from an ILEC, please provide the following:
 1. the number of business subscribers you are serving in Florida?
 2. the number of business subscriber lines that you service in Florida?
 3. the number of residential subscribers you are serving in Florida?
 4. the number of residential subscriber lines that you service in Florida?

RESPONSE: This response is being filed pursuant to a protective order.

3. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to business customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that you purchased from BST? If yes:

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FPSC-RECORDS/REPORTING

- a. Through the use of your facilities and UNE's purchased from BST, please provide the following:
1. the number of business subscribers you are serving in BellSouth's territory in Florida?
 2. the number of business subscriber lines that you service in BellSouth's territory in Florida?

RESPONSE: This response is being filed pursuant to a protective order.

4. If your response to 2 is in the affirmative, do you currently provide local exchange service in BellSouth's territory to residential customers either exclusively with your facilities or with a combination of your facilities and unbundled network elements that your purchased from BST? If yes:

- a. Through the use of your facilities and UNE's purchased from BST, please provide the following:
1. the number of residential subscribers you are serving in BellSouth's territory in Florida?
 2. the number of residential subscriber lines that you service in BellSouth's territory in Florida?

RESPONSE: This response is being filed pursuant to a protective order.

STATE OF FLORIDA
PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth
Telecommunications, Inc.'s Entry
Into InterLATA Services Pursuant to
Section 271 of the Federal
Telecommunications Act of 1996.

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)
) Docket No. 960786-TL
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**MOTION OF AMERITECH COMMUNICATIONS INTERNATIONAL, INC.
FOR PROTECTIVE ORDER REQUESTING CONFIDENTIAL CLASSIFICATION
FOR RESPONSE TO COMMISSION DATA REQUESTS**

Ameritech Communications International, Inc. ("ACII"), through its counsel, and pursuant to Chapter 364.183 of the Florida Statutes and Chapter 25-22.06 of the Florida Rules of Practice and Procedures, hereby respectfully moves the Florida Public Service Commission ("Commission") for a protective order classifying ACII's response to the Commission's Data Requests, Questions 1-4, in Docket No. 960786-TL (the "Data Requests") as confidential information. This response contains information which ACII considers proprietary confidential business information constituting trade secrets and relating to ACII's competitive interests, the disclosure of which would impair ACII's ability to compete in Florida.

ACII believes that disclosure of this information would require it to reveal highly valuable, commercial information which ACII considers confidential, proprietary and a trade secret. Specifically, the above-referenced response contains proprietary business information concerning ACII's operations and customers. Disclosure of this information would allow a competitor to make determinations that are relevant to competitive services, and provide such competitor an advantage in the local service marketplace. The growth in competitive alternatives increases the need to protect this information by placing it under protective seal.

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FPSC-RECORDS/REPORTING

Moreover, disclosure of such information would severely jeopardize ACII's ability to compete with other telecommunications providers. ACII has and will continue to use its best efforts to treat the information in the above-referenced document privately and not disclose it. If this information were to be published or released to the public, competitors would find it of great economic value in determining their own business plans, and in many cases could use such information to structure their plans in such a way to undercut ACII's competitive position.

Attached hereto as Exhibit 1 is a copy of ACII's Responses to the Data Requests, enclosed in a sealed enveloped.

For the above reasons, ACII respectfully moves that the Commission grant a Protective Order classifying ACII's response as confidential information and allowing ACII to file the response under seal.

Respectfully submitted,

Ameritech Communications International, Inc.

By:



Glenn S. Richards
Jaqualin Friend Peterson

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Its Attorney

Dated: May 13, 1998

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May. 13. 1998 12:18PM

VERIFICATION

I, Leander R. Valent, being duly sworn according to law, depose and say that I am the Vice President and General Counsel of Ameritech Communications International, Inc.; that I am authorized to and do make this verification for it; and that the facts set forth in the foregoing Response and Petition are true and correct to the best of my knowledge, information and belief and that I expect Ameritech Communications International, Inc., to be able to prove the same at any hearing hereof.



Leander R. Valent

STATE OF Illinois)
CITY AND COUNTY OF Chicago, Cook)

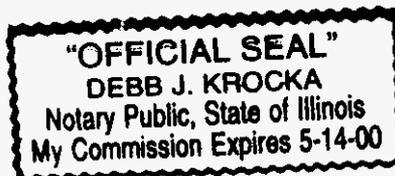
SS.

SUBSCRIBED AND SWORN to me this 13th day of May 1998.

Witness my hand and official seal.



Notary Public



CERTIFICATE OF SERVICE

I, Kim Lacey, a secretary in the law firm of Fisher Wayland Cooper Leader & Zaragoza L.L.P., do hereby certify that on May 14, 1998, a true and accurate copy of the foregoing **Response of Ameritech Communications International, Inc. to Data Requests Propounded by The Florida Public Service Commission** was served by first class United States mail, postage prepaid, to the following:

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