

55-0729
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Legal Department

MARY K. KEYER
General Attorney

30 JUL 31 PM 3:16

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

RECORDS AND
REPORTING

July 31, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

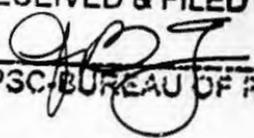
Re: Docket No. 980733-TL
Special Project No. 980000A - SP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Responses to the Data Requests served by the Public Service Commission's Division of Auditing & Financial Analysis regarding 980000A-Undocketed Special Project and a Notice of Intent to Request Specified Confidential Classification, 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 to the parties shown on the attached Certificate of Service.

RECEIVED & FILED


FPSC/BUREAU OF RECORDS

Sincerely,

Mary K. Keyer (ke)
Mary K. Keyer

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

This Notice of Intent was filed with Confidential Document No. 08089-98. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

DOCUMENT NUMBER-DATE

08088 JUL 31 98

FPSC-RECORDS/REPORTING

rate. . . .”

2. In Item No. 5.C, the Commission requested work papers and documents used in the development and determination of the depreciation parameters provided by BellSouth in response to Item No. 5.A and B.

3. In Item Nos. 13 and 14, the Commission requested copies of reports or analyses prepared by or for Standard & Poor's and Moody's Investor Services from January 1, 1997, through the present.

4. The documents provided in response to Item Nos. 5.C and those requested in Item Nos. 13 and 14 are proprietary, confidential business information that should not be publicly disclosed. This information falls within Florida Statutes § 364.183 (3)(e), which defines the terms "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market to the ultimate detriment of the consumer.

5. Furthermore, the information requested in Item Nos. 13 and 14 is so sensitive that any individual who reviews the information is deemed to be an "insider" for purposes of the Securities and Exchange Commission rules.

6. The information being provided is clearly confidential and proprietary under Florida Statutes, Section 364.183, including but not limited to § 364.183(3)(e).

CERTIFICATE OF SERVICE
Special Project No. 980000A-SP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 31st day of July, 1998 to the following:

Division of Auditing and Financial Analysis
Tim Devlin - Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Division of Communications
Walter D'Haeseleer
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Jack Shreve
Public Counsel
Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Mary K. Keyer (ke)
Mary K. Keyer

rate. . . ."

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6. The information being provided is clearly confidential and proprietary under Florida Statutes, Section 364.183, including but not limited to § 364.183(3)(e).

7. Because this information is proprietary, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3), Florida Administrative Code, in order to allow the Commission Staff to take possession of the information without delay. The original of this notice has been filed with the Division of Records and Reporting.

Respectfully submitted this 31st day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (ke)
ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5555

William J. Ellenberg II (ke)
WILLIAM J. ELLENBERG II
MARY K. KEYER
675 West Peachtree Street,
Suite 4300
Atlanta, Georgia 30375
(404)335-0711

128717

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