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Legal Department

MARY K. KEYER
General Attorney

98 AUG -3 PM 4: 55

BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
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RECORDS AND
REPORTING

August 3, 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 Communications 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.

Sincerely,

Mary K. Keyer (kai)
Mary K. Keyer

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II (w/o enclosures)

Response
DOCUMENT NUMBER-DATE

08203 AUG-3 98

FPSC-RECORDS/REPORTING

Notice
DOCUMENT NUMBER-DATE

08204 AUG-3 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair & Reasonable Rates and on Relationships Among Costs and Charges Associated with Certain Telecommunications Services Provided by LECs, as Required by Chapter 98-277.)

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

Filed: August 3, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'s NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Notice of Intent to Request Specified Confidential Classification for information produced in response to the fair and reasonable rates data requests served by the Public Service Commission, Division of Communications.

1. In a Memorandum re: 980000A-SP Undocketed Special Project, dated June 19, 1998, the Florida Public Service Commission ("Commission"), Division of Communications, requested that BellSouth provide it with certain contribution analyses and supporting cost studies based on the total service long-run incremental cost standard or a reasonably comparable measure for use in providing a report to the Legislature regarding "the relationships among the costs and charges associated with providing basic local service, intrastate access, and other services provided by local exchange telecommunications companies," and the Commission's "conclusions as to the fair and reasonable Florida residential basic local telecommunications service rate. . . ."

DOCUMENT NUMBER-DATE

08204 AUG-3 88

FPSC-RECORDS/REPORTING

2. In Item Nos. 1(b), (d), (f), (h) and (j), 2(b), 3(b), 4(b) and (c), the Commission requested the cost studies and associated work papers and related documentation which resulted in the contribution analyses that were requested in other portions of those data requests. In Item No. 1(e), the Commission requested a contribution analysis for ESSX/Centrex service.

3. In Item No. 5(a), (b) and (g), the Commission requested various marketing studies, reports, and analyses concerning the relationship between the price and quantity demanded for various services offered by BellSouth, consumption patterns of Florida consumers, and other marketing information.

4. The documents provided in response to Item Nos. 1(b), (d), (e), (f), (h), and (j), 2(b), 3(b), 4(b) and (c), 5(b) and (g) and some of those provided in response to Item No. 5(a) 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. The information being provided is clearly confidential and proprietary under Florida Statutes, Section 364.183, including but not limited to § 364.183(3)(e).

6. 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 3rd day of August, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (cc)

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NANCY B. WHITE
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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 3rd day of August, 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
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Mary K. Keyer (ck)
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