

ORIGINAL



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Attorney

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August 21, 1998

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

Dear Mrs. Bayo:

Re: Docket No. 980000A-SP / Docket No. 980733-TL (Discovery)

You will find enclosed for filing in the above-referenced docket an original and fifteen (15) copies of AT&T's Notices of Serving Its First Requests for Production of Documents (15) to GTE Florida Incorporated, BellSouth Telecommunications, Inc. and Sprint-Florida, Inc. *09072-98 09073-98 09074-98*

Copies of the foregoing are being served on the parties of record in accordance with the attached certificate of service.

Yours truly,

*TH* Tracy Hatch

TH/mr  
Enclosures  
cc: Parties of Record

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

RECEIVED & FILED  
*[Signature]*  
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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fair and Reasonable )  
Residential Basic Local )  
Telecommunications Rates )

Special Project No. 980000A-SP

In re: Discovery related to study )  
on fair and reasonable rates and on )  
relationships among costs and )  
charges associated with certain )  
telecommunications services )  
provided by local exchange )  
companies (LECs), as required by )  
Chapter 98-277, Laws of Florida. )

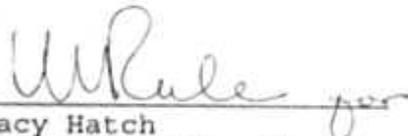
Docket No. 980733-TL (Discovery)

Filed: August 21, 1998

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S  
NOTICE OF SERVING ITS FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS (1-3) TO SPRINT-FLORIDA, INC.**

AT&T Communications of the Southern States, Inc. (hereinafter "AT&T"), by and through its undersigned attorney, hereby files this notice of service of its First Request for Production of Documents (1-3) to Sprint-Florida, Inc. on this 21st day of August, 1998.

Respectfully submitted,



Tracy Hatch  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(850) 425-6364 (phone)  
(850) 425-6361 (fax)  
ATTORNEY FOR AT&T  
COMMUNICATIONS OF THE  
SOUTHERN STATES, INC.

DOCUMENT NUMBER-DATE

09074 AUG 21 98

FPSC-RECORDS AND COMM. INFO

2. In Item Nos. 1(b), (d), (f), (h) and (j), 2(b), 3(b), and 4(b), 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) and (b), 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 5(b) 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. On August 3, 1998, BellSouth filed its Responses to the Division of Communications' Data Requests and a Notice of Intent to Request Specified

Confidential Classification for certain confidential documents provided in response to Data Requests 1(b), (d), (e), (f), (h) and (j), 2(b), 3(b), 4(b), 5(a) and (b).

6. BellSouth is filing a Request for Confidential Classification for the subject documents because they contain confidential and proprietary business information developed at BellSouth's costs.

7. BellSouth has appended to this Request for Confidential Classification as Attachment A a description of the documents designated by BellSouth as confidential.

8. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

9. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

10. The requested documents contain information considered to be confidential and proprietary to BellSouth and includes cost studies and associated work papers and related documentation which resulted in the contribution analyses requested in the Commission's Data Requests, as well as 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, other marketing information, and contractual vendor information. Public disclosure of this information provides BellSouth's competitors with an unfair advantage and would allow them to benefit from the time and money expended by BellSouth in developing the information contained in the subject documents. This same information from 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 Florida Statutes, Section 364.183, including but not limited to Sections 364.183(3)(d) and (e). 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 Request 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 21st day of August, 1998.

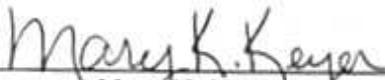
BELLSOUTH TELECOMMUNICATIONS, INC.

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

**CERTIFICATE OF SERVICE**  
**Docket No. 980733-TP**  
**Special Project No. 980000A-SP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 21st day of August, 1998, to the following:

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

  
Mary K. Keyer