

ORIGINAL

Legal Department

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General Attorney

RECEIVED - FPSC

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09 SEP 18 PM 4:31

RECORDS AND
REPORTING

September 18, 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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification, which we served today. Please file them 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,


J. Phillip Carver (re)
J. Phillip Carver

| | | |
|-----|-------|--|
| ACK | _____ | RECEIVED & FILED |
| AFA | _____ | |
| APP | _____ | FPSC BUREAU OF RECORDS |
| CAF | _____ | |
| CMU | _____ | Enclosures |
| CTR | _____ | |
| EAG | _____ | cc: All parties of record |
| LEG | _____ | A. M. Lombardo |
| LIN | _____ | R. G. Beatty |
| OPC | _____ | William J. Ellenberg II (w/o enclosures) |
| RCH | _____ | |
| SEC | _____ | |
| WAS | _____ | |
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X-ref 09455-92
DOCUMENT NUMBER-DATE
10310 SEP 18 98
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: September 18, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. On August 5, 1998, BellSouth filed its response to FCTA's First Interrogatories (Nos. 1-5). The Florida Public Service Commission Staff ("Staff") subsequently requested a copy of these responses. Prior to providing these responses to Staff, on August 28, 1998, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification for the subject information.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing of the location of the information designated by BellSouth as proprietary.

3. Appended hereto as Attachment B are two copies of the subject exhibit with the proprietary information deleted.

4. Appended hereto as Attachment C is a sealed envelope containing one copy of the exhibit, including the material which is proprietary.

5. The subject interrogatory responses contain information regarding line counts at the wire center level. This information is commercially sensitive information that is not disclosed to the public. Disclosure of this confidential information could substantially harm the competitive position of BellSouth by assisting competitors in analyzing market opportunities, and in preparing marketing strategies to use in direct competition with BellSouth. Thus, if this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 364.183(3)(e).

6. 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.

7. 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 September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (kr)

ROBERT G. BEATTY

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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 980696-TP
Staff's Request for FCTA's 1st Set of
Interrogatories
Item Nos. 2 and 3
Request for Confidential Classification
Page 1
9/18/98

REQUEST FOR CONFIDENTIAL CLASSIFICATION Of Staff's Request for FCTA's 1st Set o. Interrogatories, Item Nos. 2 and 3, August 28, 1998 filed IN DOCKET NO. 980696-TP

Explanation of Proprietary Information

1. The number of lines by wire center is proprietary, confidential business information that is commercially sensitive information and should not be disclosed to the public. Disclosure of such confidential information could substantially harm the competitive position of BellSouth by assisting competitors in analyzing market opportunities, and in preparing marketing strategies to use in direct competition with BellSouth.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION Of Staff's Request for
FCTA's 1st Set of Interrogatories, Item Nos. 2 and 3, August 28, 1998 filed
IN DOCKLT NO. 980696-TP**

Item No. 2

| <u>PAGE NO.</u> | <u>LINE NOS./COL. NO.</u> | <u>REASON</u> |
|-----------------|---------------------------|---------------|
| 2-201 | No. of Lines Column | 1 |

Item No. 3

| <u>PAGE NO.</u> | <u>LINE NOS./COL. NO.</u> | <u>REASON</u> |
|-----------------|---|---------------|
| 1-4 | Residence Switched Column Business Switched Column Business Non-Switched Column | 1 |

**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and Hand Delivery* this 18th day of September, 1998 to the following:

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(+) Protective Agreements