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Legal Department

MARY K. KEYER
General Attorney

98 SEP 29 PH 4:45

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

RECORDS AND
REPORTING

September 29, 1998

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

RE: Docket No. 980733-TL

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s, Request for Confidential Classification. Please file these documents in the captioned docket.

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 on the parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OT

FPSC-BUREAU OF RECORDS

Mary K. Keyer
Mary K. Keyer

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg (w/o enclosures)

DOCUMENT NUMBER-DATE

10746 SEP 29 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

Filed: September 29, 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 July 31, 1998, BellSouth filed its responses to Citizens' First Request for Production of Documents. The Florida Public Service Commission Staff ("Staff") subsequently requested a copy of these responses. Prior to providing these responses to Staff, on September 8, 1998, BellSouth filed a Notice of Intent to Request Confidential Classification for certain information contained therein. BellSouth is now filing a Request for Confidential Classification for the information provided in response to Request 4 of Citizens' First Request for Production of Documents.

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

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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 documents contain information regarding the amount or frequency of toll service used by residential customers. 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 Florida Statutes § 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 29th day of September, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White msx

ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

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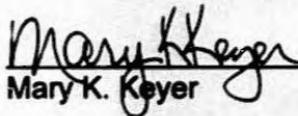
(404) 335-0711

134830

CERTIFICATE OF SERVICE
Docket No. 980733-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 29th day of September, 1998, to the following:

Beth Keating
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Mary K. Keyer

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket 980733-TL
Staff's First Request for Production of
Documents (Citizens' 1st POD)
POD No. 4
Request for Confidential Classification
Page 1
9/29/98**

REQUEST FOR CONFIDENTIAL CLASSIFICATION Of Staff's First Request For Production of Documents (Citizens' First Production of Documents, POD No. 4), August 3, 1998 filed IN DOCKET NO. 980733-TL

Explanation of Proprietary Information

- 1. The amount or frequency of toll service used by residential customers 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.**

BellSouth Telecommunications, Inc.
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Staff's First Request for Production of
Documents (Citizens' 1st POD)
POD No. 4
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION Of Staff's First Request
For Production of Documents (Citizens' First Production of Documents,
POD No. 4), August 3, 1998 filed IN DOCKET NO. 980733-TL**

POD No. 4

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
1	Total Accounts Column Total Messages Column Conversation MOU Column Sub-minute MOU Column Full Round MOU Column	1
2	Total Accounts Column Total Messages Column Conversation MOU Column Sub-minute MOU Column Full Round MOU Column	1
3	Messages Column Minutes Column	1
4	Columns A-N	1
5	Minutes Column	1
6	Toll Calls Per Acct Column Toll Calls Per Line Column Toll Mins Per Call Column	1