MARY K. NEYER General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Taltahassee, Florida 32301 (404) 335-0729 1 00T 12 PM 2:41

DEP WING

October 12, 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. 980696-TP

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.

Sincerely,

Mary K. Keyer

Enclosures

cc: All Parties of Record

A. M. Lombardo

R. G. Beatty

W. J. Ellenberg (w/o enclosures)

DOCUMENT NUMBER - DATE

11296 -OCT 128

FRED - RECIPIES IN EFORTING

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: October 12, 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 September 17, 1998, BellSouth filed its response to Staff's Third Request for Production of Documents. In its response, BellSouth identitifed certain information responsive to Requests 40 and 41 that was available for review subject to certain conditions. Staff has reviewed those documents and requested copies of specific pages, some of which contain proprietary, confidential business information. BellSouth is now filing a Request for Confidential Classification for the subject information produced in response to Requests 40 and 41.
- 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.

11296 OCT 128

- Appended hereto as Attachment B are two copies of the subject exhibit with the proprietary information deleted.
- Appended hereto as Attachment C is a sealed envelope containing one copy of the exhibit, including the material which is proprietary.
- 5. The subject exhibit contains information related to BellSouth's business plans, forecasts, and detailed financial and strategic information, which is considered proprietary to BellSouth. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. This same information on competitors is not available to BellSouth or its affiliated companies. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Fla. Stat. § 364.183(3)(e).
- 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.
- 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 12th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

WILLIAM J. ELLENBERG II

MARY K. KEYER

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0711

136717

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 this 12th day of October, 1998 to the following:

Jack Shreve, Esquire
Charles Beck, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Rm. 812
Tallahassee, Florida 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491

Michael Gross, Esquire (+)
Assistant Attorney General
Office of the Attorney General
PL-0 1 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 488-6589
Hand Deliveries:
The Collins Building
107 West Gaines Street
Tallahassee, FL 32301

Tracy Hatch, Esquire (+)
AT&T
101 N. Monroe Street, Suite 700
Tallahassee, Florida 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6361

Richard D. Melson, Esquire
Hopping, Green, Sams & Smith, P.A.
123 South Calhoun Street
Tallahassee, Florida 32314
Tel. No. (850) 425-2313
Fax. No. (850) 224-8551
Atty. for MCI

Thomar K. Bond MC! Metro Access Transmission Services, Inc. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342 Tel. No. (404) 267-6315 Fax. No. (404) 267-5992

Robert M. Post, Jr. ITS 16001 S.W. Market Street Indiantown, FL 34956 Tel. No. (561) 597-3113 Fax. No. (561) 597-2115

Charles Rehwinkel
Sprint-Florida, Inc.
1313 Blair Stone Road,
MC FLTHOO 107
Tallahassee, Florida 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777

Carolyn Marek
VP-Regulatory Affairs
S.E. Region
Time Warner Comm.
2828 Old Hickory Boulevard
Apt. 713
Nashville, TN 37221
Tel. No. (615) 673-1191
Fax. No. (615) 673-1192

Norman H. Horton, Jr., Esquire (+)
Messer, Caparello & Self P. A.
215 South Monroe Street
Suite 701
Tallahassee, Florida 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents e.spire™

David B. Erwin, Esquire Attorney-at-Law 127 Riversink Road Crawfordville, Florida 32327 Tel. No. (850) 926-9331 Fax. No. (850) 926-8448 Represents GTC, Frontier, ITS and TDS

Floyd R. Self, Esquire
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL. 32301
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents WorldCom

Kimberly Caswell, Esquire GTE Florida Incorporated 201 North Franklin Street 16th Floor Tampa, Florida 33602 Tel. No. (813) 483-2617 Fax. No. (813) 204-8870

Jeffry J. Wahlen, Esquire Ausley & McMullen 227 South Calhoun Street Tallahassee, Florida 32301 Tel. No. (850) 425-5471 or 5487 Fax. No. (850) 222-7560 Represents ALLTEL, NEFTC, and Vista-United

Tom McCabe TDS Telecom 107 West Franklin Street Quincy, FL 32351 Tel. No. (850) 875-5207 Fax. No. (850) 875-5225

Peter M. Dunbar, Esquire Barbara D. Auger, Esquire Pennington, Moore, Wilkinson, & Dunbar, P. A. 215 South Monroe Street 2nd Floor Tallahassee, Florida 32301 Tel. No. (850) 222-3533 Fax. No. (850) 222-2126 Brian Sulmonetti
WorldCom, Inc.
1515 South Federal Highway
Suite 400
Boca Raton, FL 33432
Tel. No. (561) 750-2940
Fax. No. (561) 750-2629

Kelly Goodnight
Frontier Communications
180 South Clinton Avenue
Rochester, New York 14646
Tel. No. (716) 777-7793
Fax. No. (716) 325-1355

Laura Gallagher (+)
VP-Regulatory Affairs
Florida Cable Telecommunications
Association, Inc.
310 N. Monroe Street
Tallahassee, Florida 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Mark Ellmer GTC Inc. 502 Fifth Street Port St. Joe, Florida 32456 Tel. No. (850) 229-7235 Fax. No. (850) 229-8689 Harriet Eudy ALLTEL Florida, Inc. 206 White Avenue Live Oak, Florida 32060 Tel. No. (904) 364-2517 Fax. No. (904) 364-2474

Lynne G. Brewer Northeast Florida Telephone Co. 130 North 4th Street Macclenny, Florida 32063 Tel. No. (904) 259-0639 Fax. No. (904) 259-7722

James C. Falvey, Esquire e.spire • Comm. Inc. 133 National Business Pkwy. Suite 200 Annapolis Junction, MD 20701 Tel. No. (301) 361-4298 Fax. No. (301) 361-4277

Lynn B. Hall Vista-United Telecomm. 3100 Bonnet Creek Road Lake Buena Vista, FL 32830 Tel. No. (407) 827-2210 Fax. No. (407) 827-2424

William Cox *
Staff Counsel
Florida Public Svc. Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6204
Fax. No. (850) 413-6250

Suzanne F. Summerlin, Esq. 1311-B Paul Russell Road Suite 201 Tallahassee, FL 32301 Tel. No. (850) 656-2288 Fax. No. (850) 656-5589

Paul Kouroupas
Michael McRae, Esq.
Teleport Comm. Group, Inc.
2 Lafayette Centre
1133 Twenty-First Street, N.W.
Suite 400
Washington, D.C. 20036
Tel. No. (202) 739-0032
Fax. No. (202) 739-0044

Joseph A. McGlothlin Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 11⁷ South Gadsden Street Tallahassee, FL 32301 Tel. No. (850) 222-2525

Charles Murphy

Booter Imhof

Utilities and Comm. Committee 428 House Office Building 402 South Monroe Street Tallahassee, FL 32399-1300

Mary K. Kover

(+) Protective Agreements

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket 980696-TP Staff's 3rd Document Request Request for Confidential Classification Page 1 10/12/98

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 3rd REQUEST FOR DOCUMENTS ON AUGUST 28, 1998 IN DOCKET 980696-TP

Explanation of Proprietary Information

1. The subject exhibit contains information related to BellSouth's business plans, forecasts, and detailed financial and strategic information, which is considered proprietary to BellSouth. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. This same information on competitors is not available to BellSouth or its affiliated companies. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Fla. Stat. § 364-183(3)(e).

BellSouth Telecommunications, Inc. FPSC Docket 980696-TP Staff's 3rd Document Request Request for Confidential Classification Page 2 10/12/98

POD NOS. 40 and 41

Page No.	Column
3	Entire Page
8	1997 Column 1998 Column 1999 Column
9	1994 Column 1995 Column 1996 Column 1997 Column 1998 Column 1999 Column