

ORIGINAL

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RECORDS AND
REPORTING

November 2, 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 of the Late-Filed Exhibit of Dave Cunningham which was filed as a supplemental response to Request 2 of Staff's Second Request for Production of Documents. 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
(pa)

Mary K. Keyer

Enclosures

cc: All Parties of Record
A. M. Lombardo
N. B. White
W. J. Ellenberg (w/o enclosures)

RECEIVED & FILED

EPSC-RECORDS AND REPORTING

x-rel on 11/22/98

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ORIGINAL

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: November 2, 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 October 13, 1998, BellSouth filed a Late-Filed Exhibit of Dave Cunningham as a supplemental response to Request 2 of Staff's Second Request for Production of Documents. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification of the Late-Filed Exhibit of Dave Cunningham which was filed as a supplemental response to Request 2 of Staff's Second Request for Production of Documents.

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.

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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 information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. Disclosure of such confidential information could substantially harm the competitive position of BellSouth by assisting competitors in analyzing market opportunities, and in preparing market strategies to use in direct competition with BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. 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).

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 2nd day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

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NANCY B. WHITE (N)

c/o Nancy Sims

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139726

**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 2nd day of November, 1998 to the following:

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Mary K. Keyer

(+) Protective Agreements

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 980696-TP
Cunningham's Late Filed Exhibit
Supplements Staff's 2nd Document Request
Item No. 2
Request for Confidential Classification
Page 1
11/2/98

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CUNNINGHAM'S LATE FILED EXHIBIT, OCTOBER 12, 1998, THAT SUPPLEMENTS STAFF'S 2ND REQUEST FOR DOCUMENTS, ITEM NO. 2 IN DOCKET 980696-TP

Explanation of Proprietary Information

1. The various analyses provided are considered proprietary confidential business 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. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

SUPPLEMENTAL RESPONSE

<u>Page No</u>	<u>Line/Column</u>	<u>Reason</u>
2	Lines 3-36	1
3	Entire Page	1
4	Lines 3-28	1
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10	Columns B-N	1
11	Lines 1-3,46-49 Columns AB,AC,AD,AE,AF	1
12	Lines 1-3,7,47-50 Columns AB,AC,AD,AE,AF	1
13	Lines 1,2 Columns Disp Rate, A-T	1
14	Lines 1,2 Columns Disp Rate, A-O	1
15	Lines 1-3, Columns ps. A-Q	1
16	Lines 1-3, Columns ps. A-R	1
17	Lines 2,6,44, Columns B-K	1
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