

ORIGINAL

RECEIVED-FPSC

Legal Department

NANCY B. WHITE
General Counsel-Florida

NOV -6 PM 4:17

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECORDS AND
REPORTING

November 6, 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. 980800-TP (Supra Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for Staff's Request for copies of Supra's First and Second Request for Production of Documents, which we asked that you file 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,

Nancy B. White (kk)
Nancy B. White

NBW/vf
Enclosure

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

X-ref-PN 11590-98
DOCUMENT NUMBER-DATE

12558 NOV-6 88

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980800-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

* Federal Express and U.S. Mail this 6th day of November, 1998 to the following:

Beth Keating, Esq. *
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
(850) 413-6250

Suzanne Fannon Summerlin, Esq. *
Supra Telecommunications and
Information Systems, Inc.
1311-B Paul Russell Rd., #201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4220
Fax. No. (305) 476-4282

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Nancy B. White (cc)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra) Docket No. 980800-TP
 Telecommunications and Information)
 Systems, Inc., Against BellSouth)
 Telecommunications, Inc.)
 _____) Filed: November 6, 1998

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

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

1. On August 4, 1998, Supra Telecommunications and Information Systems, Inc. ("Supra") served its First Request for Production of Documents, Nos. 1 through 22 on BellSouth. On September 3, 1998, BellSouth filed its Responses and Objections to Supra's First Request for Production, and produced certain confidential documents pursuant to a Protective Agreement. On October 13, 1998, Staff requested a copy of these documents. In order to allow Staff to have copies of certain documents, specifically those produced in response to Requests 6, 8, 9, and 17, BellSouth is now filing a Request for Confidential Classification for these documents, which contain information considered to be confidential and proprietary to BellSouth.

2. On September 15, 1998, Supra served its Second Request for Production of Documents, Nos. 23 through 56, on BellSouth. On September 23, 1998, BellSouth filed its Objections to Supra's Second Request for Production,

and on October 14, 1998, BellSouth filed its Responses and Objections to Supra's Second Request for Production, and produced certain confidential documents pursuant to a Protective Agreement. On October 13, 1998, Staff requested a copy of these documents. In order to allow Staff to have copies of certain documents, specifically those produced in response to Requests 24, 27, 28, 32, 33, 34, 44, and 45, BellSouth is now filing a Request for Confidential Classification for these documents, which contain information considered to be confidential and proprietary to BellSouth.

3. On October 16, 1998, BellSouth filed a Notice of Intent to Request Confidential Classification for Staff's requests for copies of BellSouth's responses to the requests referred to in Paragraphs 1 and 2 above. The subject information of this discovery contains information considered to be confidential and proprietary to BellSouth in the above-captioned docket.

4. BellSouth is filing a Request for Confidential Classification for the subject information contained in the documents responsive to Requests 6, 8, 9, and 17 of Supra's First Request for Production of Documents, and Requests 24, 27, 28, 32, 33, 34, 44, and 45 of Supra's Second Request for Production of Documents, which is proprietary to BellSouth and includes information containing, among other things, vendor-specific and competitive business information. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

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

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

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

8. The requested documents contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, vendor-specific information and competitive business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. This same information on 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 Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

9. 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.

10. 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 6th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KE)
NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558

William J. Ellenberg II (KE)
WILLIAM J. ELLENBERG II
675 W. Peachtree Street
Suite 4300
Atlanta, Georgia 30375
(404) 335-0711

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 1
11/6/98

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO SUPRA'S DISCOVERY REQUESTED BY FLORIDA STAFF OCTOBER 13, 1998, IN DOCKET 980800-TP

Explanation of Proprietary Information

1. The information requested concerns competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to intellectual property which was developed at significant expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as market research and market development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.
2. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. 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 Section 364.183(3)(e).
3. This information contains the floor plans of BellSouth central offices. These plans are considered to be proprietary and confidential business information. These offices have limited access and are the central focal point of telecommunications in their geographic location. Public disclosure of this information would impair BellSouth's ability to keep these office and the communications network secure. 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 363.183, Florida Statutes and is exempt from the open Records Act.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSES TO SUPRA'S DISCOVERY REQUESTED BY FLORIDA STAFF
OCTOBER 13, 1998, IN DOCKET 980800-TP**

Explanation of Proprietary Information

4. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis; names of individuals assigned to certain projects; key details relating to the substance of such projects as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive response. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
5. This information is considered by BellSouth to be employee personnel information unrelated to compensation, duties, qualifications or responsibilities. This information is a name and/or control number used to identify an employee in lieu of a social security number. Such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information.
6. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. 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(3) and (3)(d), Florida Statutes.

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 3
11/6/98

POD NO. 6

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		1 and 3

POD NO. 8

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Lines 5-21	2
2	Lines 4-8, Columns 3 YR Growth Square Foot Space	2 2 2
3	Lines 11,12,14-19	2

POD NO. 9

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		4 and 3

POD NO. 17

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		4

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 4
11/6/98

POD NO. 24

North Dade Golden Glades File 10

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-25	Qty Column	2

Continuing Property Record Report

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-50	Yr Qty Column	2
	Yr Mat Cost Column	2 and 6
	Yr In Plc Cost Column	2 and 6
	ECN	2
	ECN In Plc Cost Column	2 and 6

Telecommunications Equipment Order

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Lines 4-11,19-23,25-29,36-39	2 and 6
2	Lines 6,14,15	2 and 6
3	Lines 2,3,6-11,23,25-27,31-34	2 and 6
4	Lines 2,3,6-11,23,25-57,32-36	2 and 6
5	Lines 2,3,6-11,22,24-26,30-33	2 and 6
6	Lines 1-8,14,32-38	2 and 6
7	Lines 4-9,20,22-24,29-33	2 and 6
8	Lines 1-7,15-19,21-25,31-36	2 and 6
9	Lines 1-7	2 and 6
10	Lines 1-8,16-225,32-37	2 and 6
11	Lines 1,2,4,5	2 and 6
12	Lines 1-7,15-25,32-37	2 and 6
13	Lines 1-3	2 and 6
14	Lines 1-7,15-25,32-35	2 and 6
15	Lines 1-7,15-25,32-35	2 and 6
16	Lines 1-7,15-19,21-25,32-35	2 and 6
17	Lines 2-8,10-15,17,18,20,21	2 and 6
18	Lines 1-7,15-19,21-25,32-36	2 and 6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 5
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
19	Lines 1,2	2
20	Lines 1-7, 15-19,21-25,32-35	2 and 6
21	Lines 1-5,7-10	2
22	Lines 1-7, 15-19,21-25,32-35	2 and 6
23	Line 3	2
24	Lines 2,4,6,7	2
	Columns A-D	2
	Lines 31,32	2
25	Lines 1-7, 15-19,21-25,32-35	2 and 6
26	Lines 1,3,4	2 and 6
27	Lines 1-8	2
28	Lines 1-7, 15-19,21-25,32-35	2 and 6
29	Lines 1,3	2 and 6
30	Lines 2,6,7	2
31	Lines 1-7, 15-19,21-25,32-35	2 and 6
32	Lines 1,3,4	2 and 6
33	Lines 2-6	2
34	Lines 1-7, 15-19,21-25,32-35	2 and 6
35	Lines 1,3,4	2 and 6
36	Lines 2-4	2
37	Lines 1-7, 15-19,21-25,32-35	2 and 6
38	Lines 1,3	2 and 6
39	Lines 1-5,7-12,14-18	2
40	Lines 1-7, 15-19,21-25,32-35	2 and 6
41	Line 1	6
	Qty Column, Description Column	2
42	Lines 2-3	2
43	Lines 1-8, 16-20, 22-26,33-37	2 and 6
44	Lines 2-10,12,13	2
45	Lines 1-8,16-20,22-26,33-36	2 and 6
46	Lines 2-10,12,13	2

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 6
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
47	Lines 1-7,15-19,21-25,32-35	2 and 6
48	Lines 1-8,15,16,22,24,33-36	2 and 6
49	Lines 1-8,15,16,18,22,24,33-36	2 and 6
50	Lines 1-8,16,18,22,24,35,36	2 and 6
51	Lines 1-8,18,24,35-44	2 and 6
53	Lines 1,4,8	6
	Supernode Column	2
	Dig Net Inter Column	2
	Dig Trk Equip Column	2
	Product Code	2 and 6
	Cust Add Column	2
	Add Column	2
	Lines 12,13,17	2 and 6
54	Lines 1,5	6
	Equipment Desc Column	2
	ENET Column	2
	STP Link Interf Column	2
	Pwr Dist Cont	2
	Speech Link Con Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 43,44,48	2 and 6
55	Lines 1,5	2 and 6
	Equipment Desc Column	2
	Mtce Tools Column	2
	Trk Mod Equip Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 25,26,30	2 and 6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 7
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
56	Lines 1,5	2 and 6
	Spares Column, Product Column	2
	Cust Add Column, Add Column	2 and 6
	Lines 26,27,31	2 and 6
57	Lines 1,3	2 and 6
	SW Feature Pkgs Column	2
	Product Code Column	2
	Cust Add Column, Add Column	2 and 6
59	Lines 14,15,19	2 and 6
	Lines 1,4,8	2 and 6
	Dig Trk Equip Column	2
	ENET Column	2
	Pwr Dist Cont Column	2
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add, Add Column	2 and 6
	Lines 37,38,42	2 and 6
	Lines 1-8,18,24,33-37	2 and 6
60	Lines 1-8,18,24,36-40	2 and 6
61	Lines 1-8,15,33,34,36-40	2 and 6
62	Lines 1-8,18,24,36,37	2 and 6
63	Lines 1,4,8	2 and 6
65	Equip Desc Column	2
	ISDN Lte Column	2
	Net Dbl Shelf Column	2
	Pwr Dist Cont	2
	Speech Link Con	2
	Mtce Tools Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 33,34,38	2 and 6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 8
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
66	Lines 1,5	2 and 6
	Spares Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 12,13,17	2 and 6
67	Lines 1,2	2 and 6
	Columns SW Feature	2
	Product Code Column	2
	Cust Add column	2
	Add Column	2 and 6
	Lines 46,47,51	2 and 6
68	Lines 1,2	2 and 6
	Equip Desc Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 48,49,53	2 and 6
69	Lines 1,2	2 and 6
	Equip Desc Column	2
	Product Code Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 48,49,53	2 and 6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 9
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>	
71	Lines 1,2,8	2 and 6	
	Equip Desc Column	2	
	Supernode Column	2	
	Dig Net Inter Column	2	
	Dig Trk Equip	2	
	Line Conc Equip	2	
	ISDN LCE Column	2	
	Product Code Column	2	
	Cust Add Column	2	
	Add Column	2 and 6	
	Lines 38,39,43	2 and 6	
	72	Lines 1,5	2 and 6
		Line Grp Equip Column	2
		ISDN Lge Column	2
STP Link Intf Column		2	
LME4-Port Column		2	
Net Dbl Shelf Column		2	
Product Code Column		2	
Cust Add Column		2	
Add Column		2 and 6	
Lines 40,41,45		2 and 6	
73	Line 5	6	
	Pwr Dist Cont Column	2	
	Subs Carr Mod Column	2	
	Speech Link Con Column	2	
	Mtce Tools Column	2	
	Product Code Column	2	
	Cust Add Column	2	
	Add Column	2 and 6	
	Lines 24,25,29	2 and 6	

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 10
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
74	Lines 1,5	2
	Spares Column	2
	Product Column	2
	Cust Add Column	2
	Add Column	2 and 6
	Lines 9,10,14	2 and 6
76	Lines 1,5	2 and 6
	Supernode Column	2
	Dig Net Inter Column	2
	Dig Trk Equip Column	2
	Input/Output Eqp Column	2
	Line Conc Equip Column	2
	Line Grp Equip Column	2
	Product Code Column	2
	Add Column	2
	Lines 36,37,41	2 and 6
	Equip Desc Column	2
	Net Dbl Shelf Column	2
	Pwr Dist Cont Column	2
	Subs Carr Mod Column	2
	Speech Link Column	2
	Mtce Tools Column	2
	Product Code Column	2
	Add Column	2
	Lines 1,2,6	2 and 6
	78	Trk Mod Equip Column
Product Code Column		2
Add Column		2
Lines 1,2,6		2 and 6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 11
11/6/98

Telecommunications Equipment Order (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>	
79	Lines 2	2 and 6	
	Spares Column	2	
	Product Column	2	
	Add Column	2 and 6	
	Lines 21,22,26	2 and 6	
80	Line2	2 and 6	
	SW Feature Pk Column	2	
	SW Master Pk Column	2	
	Non-CM NCL Column	2	
	Product Code Column	2	
	Add Column	2 and 6	
	Lines 16,17,21	2 and 6	
82	Lines 1,2,8	2 and 6	
	Dig Trk Equip column	2	
	ENET Column	2	
	STP Link Column	2	
	Pwr Dist Cont Column	2	
	Product Code Column	2	
	Cust Add Column	2	
	Add Column	2 and 6	
	Lines 41,42,46	2 and 6	
	83	Line 5	2 and 6
		Mtce Tools Column	2
Product Code Column		2	
Cust Add Column		2	
Add Column		2 and 6	
Lines 10,11,15		2 and 6	

BellSouth Telecommunications, Inc.
 FPSC Docket 980800-TP
 Staff's Request for BellSouth's
 Responses to Supra's Discovery
 Request for Confidential Classification
 Page 12
 11/6/98

POD NO. 27

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		2

POD NO. 28

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		3

POD NO. 32

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-6	Reference Number	6

POD NO. 33

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1-247	Customer	5
	Authorizer	5
	User	5
	Person	5
	Accounts	6
	Actual	6
	Estimate	6
	Contractor	6

BellSouth Telecommunications, Inc.
FPSC Docket 980800-TP
Staff's Request for BellSouth's
Responses to Supra's Discovery
Request for Confidential Classification
Page 13
11/6/98

POD NO. 34

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
1	Name of Employee Column	5

POD NO. 44 & 45

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
Entire Document		1, 2 and 6