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Legal Department

NANCY B. WHITE  
General Counsel-Florida

NOV 10 PM 2:21

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

RECORDS AND  
REPORTING

November 10, 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 Specified Confidential Classification for the Deposition of Barbara Cruitt, 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*  
Nancy B. White (PW)

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

- ACK
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

NBW/vf  
Enclosure

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

*x-ref 11659-98*  
DOCUMENT NUMBER-DATE

~~12610~~ NOV 10 98

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 10th 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 (fw)

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.	)	
<hr/>		Filed: November 10, 1998

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

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

1. On October 20, 1998, BellSouth filed a Notice of Intent to Request Specified Confidential Classification for the Deposition of Barbara Cruik. The Deposition contains information considered to be confidential and proprietary to BellSouth in the above captioned docket.

2. BellSouth is now filing a Request for Specified Confidential Classification for the subject information because the information contained in the Deposition is proprietary to BellSouth and includes information containing, among other things, business plans, forecasts and other confidential business information.

3. 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.

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

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

6. The Deposition contains information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, business plans, forecasts and other confidential 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.

7. 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.

8. 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 10th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (NW)

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558

*William J. Ellenberg II*

WILLIAM J. ELLENBERG II (WJ)

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0711

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Cruit Deposition  
Request for Confidential Classification  
Page 1  
11/10/98

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CRUIT DEPOSITION FILED OCTOBER 19, 1998, IN DOCKET 980800-TP

#### Explanation of Proprietary Information

1. 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).
2. 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.

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Cruit Deposition  
Request for Confidential Classification  
Page 1  
11/10/98

### CRUIT DEPOSITION

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
21	2-4,21	1
33	14-16	1
38	6,7,17,20	1
39	6,7	1
40	2-5	1
41	22,24	1
42	1-3	1
45	6,7,10-12	1
50	8,22	1
51	3-8,11,14	1
	9	2
52	3-8,11,12,15,16,21,25	1
53	7,23	1
54	9,10,17,24	1
55	1,7,8	1
57	4,7-9,12,13,17,20-23	1
58	5,6	1
61	24,25	1
62	14-17	1
64	11-14,16,17,21,22	1
65	1-9	1
66	4,24	1
67	19-21,23,24	1
72	6-9,11-14	1
76	21-25	1 and 2
77	2-4,9-11,13,14	1
	6	2
78	25	1
79	1,5-12,16,17,20,21,25	1

CRUIT DEPOSITION (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
80	1-6	1
81	9,10	1
82	23	1
83	2,3,7,13,15,17-20,25	1
84	1,3,5,7	1
86	10-12	1
87	3-6	1
90	1-4	1
94	1	1
96	8,11-14,17	1
98	16,21	1
99	7,8,10	1
100	19-21	1
101	2,14,15,17,21-23,25	1
102	1,3-7,11,21-23,25	1
103	2,3,6,9,12-17,22-25	1
104	2,3,6-11,13-15,18-20	1
106	13,14,16,19,23,25	1
107	1,10-15,18-21,23	1
108	4,16	1
109	2,3,9,10,16,17	1
	13	2
110	7	1
111	25	1
112	2,4	1
122	9	1
123	7,8	1
124	14,15,19	1
126	8-11	1
127	17-20	1
129	11-14,16,17,23,24	1
130	5,7,8	1
131	3-10	1
132	3-5	1
134	24	1
135	4	1
139	12	1