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Legal Department

MARY K. KEYER  
General Attorney

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

RECORDS AND  
REPORTING

November 18, 1998

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

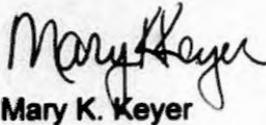
RE: Docket No. 980733-TL

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.

Sincerely,

  
Mary K. Keyer

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

Enclosures

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

x-ref 12062-98  
DOCUMENT NUMBER-DATE  
12991 NOV 18 98  
FPSC-RECORDS/REPORTING

ORIGINAL

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: November 18, 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 28, 1998, BellSouth filed its response to Staff's Second Request for Production of Documents, incorrectly identified by Staff as Staff's First Request for Production of Documents, which requested copies of completed spreadsheets containing certain revenue information produced by BellSouth to the FCC. On that same day, BellSouth filed a Notice of Intent to Request Confidential Classification for the documents it produced that contained certain revenue information. BellSouth is now filing a Request for Confidential Classification for the information provided in response to Request 1 of Staff's Second Request for Production of Documents, incorrectly identified as Staff's First Request for Production of Documents.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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

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 certain revenue information for BellSouth by class of customer. 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).

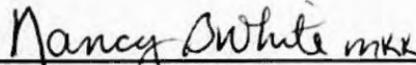
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

7. The original of this 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 18th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

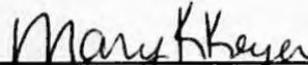
NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558



WILLIAM J. ELLENBERG II

MARY K. KEYER

675 W. Peachtree Street

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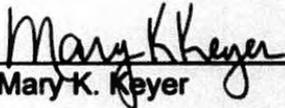
(404) 335-0729

139015

**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 18th day of November, 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-TP  
Staff's Second Request for Production of  
Documents, POD No. 4  
Request for Confidential Classification  
Page 1  
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### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, POD NO. 4 FILED SEPTEMBER 23, 1998, IN DOCKET 980733-TP**

#### **Explanation of Proprietary Information**

- 1. The subject information is confidential business information of BellSouth. Such data is not typically released outside the company or made public by BellSouth. The provided information is being disaggregated to such a level that 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. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).**

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980733-TP  
Staff's Second Request for Production of  
Documents, POD No. 4  
Request for Confidential Classification  
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11/18/98

### POD NO. 4

<u>Chart</u>	<u>Line/Column</u>	<u>Reason</u>
Chart 1	Lines 4,6-9,11-14,19	1
Chart 2	Lines 21 B-D 22 B-D 23 B-D 25 C-E 26 C-E	1
Chart 3	Lines 28 B-D 29 B-D 30 B-D 32 C-E 33 C-E	1
Chart 4a	Lines 35-41	1
Chart 4b	Lines 43-49 Line 50 B-F	1
Chart 4c	Lines 51-57 Lines 58 B-F	1
Chart 5a	Lines 59-65	1
Chart 5b	Lines 67-73 Line 74 B-E	
Chart 5c	Lines 75-81 Line 82 B-E	1