

RECEIVED-FPSC

Legal Department

BENNETT L. ROSS  
General Attorney

29 FEB 25 PM 4:26

BellSouth Telecommunications, Inc.  
180 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 336-0793

RECORDS AND  
REPORTING

ORIGINAL

February 25, 1999

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

RE: Docket Nos. 981642-TP and 981745-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,

*Bennett L. Ross (kr)*

Bennett L. Ross

RECEIVED & FILED

*[Signature]*  
FPSC BUREAU OF RECORDS

Enclosures

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

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

DOCUMENT NUMBER-DATE

02516 FEB 25 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Petition by Intermedia Communications Inc.** )  
**For Arbitration with BellSouth Telecommunications,**)  
**Inc., Pursuant to the Telecommunications** )  
**Act of 1996** ) **Docket No.: 981642-TP**

In re: **Petition by e.s.pire Communications, Inc.** )  
**And American Communications Services of Tampa,**)  
**Inc., American Communications Services of** )  
**Jacksonville, Inc. for Arbitration of an** ) **Docket No 981745-TP**  
**Interconnection Agreement with BellSouth** )  
**Telecommunications, Inc. Pursuant to Section** )  
**252(b) of the Telecommunications Act of 1996** )  

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**Filed: February 25, 1999**

**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 February 4, 1999, BellSouth filed Exhibits DDC-1 and DDC-5 in a CD ROM and paper formats of Daonne Caldwell's Direct testimony. 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 subject information.

2. The subject information is electronically stored. Accordingly, BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the data fields and file names for which

confidential classification is requested and a field-by-field and line-by-line justification for the request.

3. BellSouth has appended to this Request as Attachment B a redacted paper copy of the data for which confidential classification is requested.

4. BellSouth has appended to this Request as Attachment C a highlighted paper copy of the data for which confidential classification is requested.

5. The subject information is related to prices that BellSouth has negotiated with specific vendors. Specifically, the subject information entails the prices, frequently discounted, that BellSouth receives on particular types of switching equipment. If the switch discount(s) that BellSouth receives were publicly disclosed, this disclosure would impair BellSouth's ability to obtain favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 164.183(3)(d).

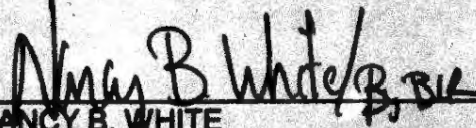
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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.

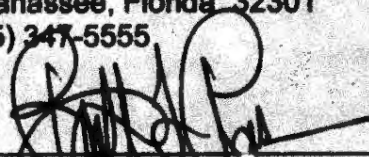
WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential information that is not subject to public disclosure.

Respectfully submitted this 25th day of February, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE

c/o Nancy Sims  
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(305) 347-5555

  
\_\_\_\_\_  
WILLIAM J. ELENBERG II

THOMAS B. ALEXANDER  
BENNETT ROSS  
675 W. Peachtree Street  
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Atlanta, Georgia 30375  
(404) 335-0711

**CERTIFICATE OF SERVICE**

**Docket Nos. 981642-TP and 981745-TP**

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

**Federal Express this 25th day of February, 1999 to the following:**

**Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32309-0857**

**Brad E. Mutschellhaus  
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**Norman H. Horton, Jr.  
Floyd R. Self  
MESSER CAPARELLO & SELF, P.A.  
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**Donna L. Canzano  
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**Scott A. Sepperstein  
Senior Policy Counsel  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
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Tel. No. (813) 829-4093  
Fax. No. (813) 829-4923**

**Bennett L. Ross (122)  
Bennett L. Ross**

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket 981642-TP, 981745-TP  
Request for Confidential Classification  
Page 1  
2/25/99**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF D. DAONNE CALDWELL'S DIRECT TESTIMONY EXHIBITS DDC-1 AND DDC-6 FILED FEBRUARY 4, 1999, IN DOCKET 981642-TP AND 981745-TP**

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

- A. This information reflects 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 trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.18 Florida Statutes and is exempt from the Open Records Act.**

**DDC-1**

PAGE	COLUMN	LINES	BASIS FOR REQUEST
629	Material	4, 5, 6, 8, 9, 10	A
	Adjustment Factor	4, 5, 6, 8, 9, 10	A
640	Material	4, 5, 6, 10, 12, 13, 14	A
	Adjustment Factor	4, 5, 6, 10, 12, 13, 14	A
651	Material	3-7, 21-28	A
	Adjustment Factor	3, 21-28	A
670	G	6, 72, 73	A
678	E & F	All	A
679	J, K &	10, 11	A
903	E	7, 8, 11, 12, 17, 18, 21, 22, 27, 28, 31, 32, 35, 36, 41, 42, 45, 46, 49, 50, 55, 56, 58, 62, 63, 67, 68, 72, 73, 76, 77	A
904	E	83, 84, 86, 90, 91, 95, 96, 100, 101, 104, 105	A
911	Value	4-6, 14-16	A
912	Value	4-6, 14-16	A
913	Value	4-6, 14-16, 24-26	A
914	Value	4-6, 14-16, 24-26	A
915	Value	4-6, 12, 24-26, 38-40	A
916	Value	52-54, 62-64	A
917	Value	4-6, 12, 24-26, 38-40	A
918	Value	52-54, 62-64	A
920	F, G, H, I, J	1-3	A
928	D, E	4-8	A
929	D, E	4-8	A
930	D, E	4-8	A
931	D, E	4-8	A
933	E - Inputs	7, 8, 10, 13, 14, 16, 19, 20, 22, 25, 26, 28, 31, 32, 34, 37, 38, 40, 44, 45	A
934	E - Inputs	49, 51, 52, 55, 56, 60, 61, 65, 66, 69, 70, 73, 74, 76, 79, 80, 82, 85, 86, 88	A
935	E - Inputs	91, 92, 94, 97, 98, 100, 103, 104, 106, 109, 110, 112, 116, 117, 121, 123, 124, 127, 128, 132, 133	A
936	E - Inputs	137, 138, 141, 142, 145, 146, 151, 152, 154, 157, 158, 160,	A

		163, 164, 166, 169, 170, 172, 175, 176, 178	
937	E - Inputs	181, 182, 184, 188, 189, 193, 195, 198, 199, 204, 205, 209, 210, 214, 215, 220, 220	A
938	E - Inputs	224, 225, 229, 230, 235, 236, 237, 241, 242, 245, 246, 249, 250, 255, 256, 257, 259, 262, 263, 264,	A
939	E - Inputs	267, 270, 271, 275, 278-285, 298-300	A
	F. O	278-285, 298-300	A
948	Value	2, 4, 8, 15, 17, 21, 28, 30, 3 4, 41, 43, 46,	A
949	Value	52, 54, 58, 65, 67, 71, 80, 82, 89, 93, 95	A
950	Value	102, 104, 109, 113, 114, 117, 121, 123, 126, 131, 133, 136, 141, 143, 146	A
951	Value	2, 4, 8, 15, 17, 21, 28, 30, 34, 41, 43, 46,	A
952	Value	52, 54, 58, 65, 67, 71, 80, 82, 89, 93, 95,	A
953	Value	102, 104, 109, 113, 114, 117, 121, 123, 126, 131, 133, 136, 141, 143, 146	A
954	Value	3, 5, 8, 15, 17, 20, 27, 29, 32, 39, 41, 44,	A
955	Value	54, 55, 58, 65, 67, 70, 79, 81, 89, 93,	A
956	Value	103, 105	A
957	Value	3, 5, 15, 17, 27, 29, 39, 41,	A
958	Value	53, 55, 65, 67, 91, 93	A
959	Value	103, 105, 113, 115, 125	A
960	Value	3, 4, 8, 12, 13, 18, 22, 23, 28	A
961	Value: Yrs 1, 2 & 3	3, 4, 5, 6, 11, 12, 13, 15, 16, 17, 18, 19	A
962	Value: Yrs. 1, 2 & 3	15, 16, 17, 18, 19, 20	A
963	AI, FL, GA, KY, LA, MS, NC, SC, TN	All	A



964	AL, FL, GA, KY, LA, MS, NC, SC, TN	All	A
965	AL, FL, GA, KY, LA, MS, NC, SC, TN	All	A
966	Switch thru HSSI	AL- TN	A
	Slots on Switches	AL - TN	A
	DSO on 4P	AL - TN	A
	DSI on 10P	AL - TN	A
	DSI Util on Pat. Pan	AL - TN	A
967	A thru Co	All	A
1505	D, G	All	A
1511 - 1577	GTE Stk Price, Quantity	All	A
1578	GTE	All	A
	Price Per Ft. 6/15/98	3-13, 16-30, 35-45, 48-52, 57-68, 71-78, 81-91, 94-97	A
	Quantity 6/1/97 - 5/31/98	All	A
1579	GTE	All	A
	Price Per Ft. 6/15/98	100-105, 108-122, 125-130, 133-144, 147-152, 155-159, 164-170, 173-183	A
	Quantity 6/1/97- 5/31/98	All	A
1580	GTE Stk	All	A
	Price Per Ft. 6/15/98	3-8, 10-14, 17-18, 22- 27, 29-33, 36-37, 41, 43-48, 50-54, 57-58, 62-63, 66-72, 74-77, 80-81, 85-86	A
	Quantity 6/1/97- 5/31/98	All	A
1581	GTE Stk	All	A
	Price Per Ft. 6/15/98	87-88, 90-93, 96-97, 101-104, 106-109, 112-113, 117-118, 120-122, 124-127, 130-131, 133-134, 138-141, 143-145, 148-149, 151-152, 156-158, 160-161, 164-165, 167-168	A
	Quantity 6/1/97- 5/31/98	All	A

1582	GTE Stk	All	A
	Price Per Ft 6/1/98	172-174, 176-177, 180-181, 183-184, 188-189, 191-192, 194-195, 198-199, 201-202, 206-209, 213-216, 220-222, 224-225, 228-230, 233, 235,	A
	Quantity 6/1/97- 5/31/98	All	A
1583	GTE Stk	All	A
	Price Per Ft 6/1/98	4-27, 30-55, 58-80	A
	Quantity 6/1/97- 5/31/98	4-27, 30-55, 58-80	A
1584	GTE Stk	All	A
	Price Per Ft 6/1/98	81, 84-95, 98-108, 111-121, 124-133, 136-146, 149-152, 155-159	A
	Quantity 6/1/97- 5/31/98	81, 84-95, 98-108, 111-121, 124-133, 136-146, 149-152, 155-159	A
1585	GTE Stk	All	A
	Price Per Ft 6/1/98	162-164, 167-169, 172-176,	A
	Quantity 6/1/97- 5/31/98	162-164, 167-169, 172-176	A
1586	GTE Stk	All	A
	Price Per Ft 6/1/98	3-5, 8-10, 13-20, 23- 24, 27-28, 31-33, 36- 43, 46-48, 51, 53-54 57-60, 63-64, 67-74, 77-79	A
	Quantity 6/1/97- 5/31/98	3-5, 8-10, 13-20, 27- 28, 31-33, 36- 43, 46-48, 51, 53-54, 57-60, 63-64, 67-74, 77-79	A
1587	GTE Stk	All	A
	Price Per Ft 6/1/98	82-89, 92-93, 96-98, 101-106, 109-111, 114-121, 124-126, 129-136, 139-141, 144-146, 149-156, 159	A
	Quantity 6/1/97- 5/31/98	82-89, 92-93, 96-98, 101-106, 109-111, 114-121, 124-126, 129-136, 139-141,	A

		144-146, 149-156, 159	
1588	GTE Stk	All	A
	Price Per Ft 6/1/98	160-161, 164-166, 169-173, 176-183, 186-188, 191-193, 196-199, 202-205, 208-210, 213-214, 217-219, 222	A
	Quantity 6/1/97- 5/31/98	160-161, 164-166, 169-173, 176-183, 186-188, 191-193, 196-199, 202-205, 208-210, 213-214, 217-219, 222	A
1589	GTE Stk	All	A
	Price Per Ft 6/1/98	3-12, 15, 18, 21, 24- 33, 36-51, 54-79	A
	Quantity 6/1/97- 5/31/98	3-12, 15, 18, 21, 24- 33, 36-51, 54-79	A
1590	GTE Stk	All	A
	Price Per Ft 6/1/98	82-87, 90-115, 118- 130, 133-158	A
	Quantity 6/1/97- 5/31/98	82-87, 90-115, 118- 130, 133-158	A
1591	GTE Stk	All	A
	Price Per Ft 6/1/98	161-169, 172-179, 182-198, 201-205, 208-218, 220-221, 224-225, 228-230	A
	Quantity 6/1/97- 5/31/98	161-169, 172-179, 182-198, 201-205, 208-218, 220-221, 224-225, 228-230	A
1592	GTE Stk	All	A
	Price Per Ft 6/1/98	3-12, 15, 18, 20, 22- 27, 30-40, 43-58, 61- 62, 65-75, 78-82, 85	A
	Quantity 6/1/97- 5/31/98	Quantity 6/1/97- 5/31/98	A
1593	GTE Stk	All	A
	Price Per Ft 6/1/98	86-90, 95-98, 101- 105, 108-117, 120- 123, 126-140, 143- 150, 153-169	A
	Quantity 6/1/97- 5/31/98	86-90, 95-98, 101- 105, 108-117, 120- 123, 126-140, 143- 150, 153-169	A

1594	GTE Ssk	All	A
	Price Per Ft 6/1/98	170-172, 175-183, 186-193, 196-212, 215-219, 222-231, 234-235, 238-239, 242-244	A
	Quantity 6/1/97- 5/31/98	170-172, 175-183, 186-193, 196-212, 215-219, 222-231, 234-235, 238-239, 242-244	A

**DDC-5****FILE NAME      WORKSHEET      COLUMN      LINES      BASIS**  
**FOR****REQUEST**

<b>FILE NAME</b>	<b>WORKSHEET</b>	<b>COLUMN</b>	<b>LINES</b>	<b>BASIS</b>
Osseifl.xls	Input Sheet	1996	9-11, 16, 17, 25, 26, 29-35, 43-45, 50-51, 62-63, 71- 73, 92-97, 193- 199211-212, 217- 246, 250-251, 281- 287, 296-298, 302-305,	A
		1997	7-8, 10-11, 13, 25, 36, 41-42, 44-45, 47, 69-75, 89, 98, 103, 123, 143-148, 159, 164, 168, 187-191, 210, 215, 258-261, 265, 273- 274, 210-315, 321, 343-347, 350-351, 365, 367, 368-369, 387-392, 397-398	A
		1998	7-8, 10-13, 21-22, 25, 36-37, 41-42, 44-47, 55, 59, 64- 65, 69-70, 72-75, 85, 89, 98-99, 103- 107, 111, 118-119, 123-127, 135, 138- 139, 145-147, 152, 160, 164-168, 171, 179, 182, 187-191, 202-203, 207, 210, 216, 254-264, 270, 273-274, 310-311, 313, 318, 321- 324327, 330-331, 334-335, 337, 339, 344, 347, 351-357, 360-362, 366-368, 370, 373-378, 380- 384, 387-391, 393- 394, 397-398, 405- 415	A
		1999	20-22, 25, 36-37,	A

			54-55, 59, 65, 65, 89, 99, 111, 118- 119, 130-132, 138- 139, 152, 156, 160, 176, 202-204, 207, 210, 216, 269-270, 272-274, 278, 310-311, 313, 318, 321-324, 327, 330-331, 334-335, 337, 339, 405-416	
		2000	20-22, 37, 54-55, 59, 65, 85, 89, 99, 111, 118-119, 130- 132, 138-139, 152, 156, 160, 176, 203-204, 207, 210, 216, 269-278, 334- 339, 405-416	A
		2001	20-22, 37, 54-55, 59, 65, 85, 89, 99, 111, 118-119, 131- 132, 138-139, 152, 156, 160, 176, 203-204, 207, 210, 215, 269-278, 334339, 405-416	A
	<b>LENS</b>	1996	12, 14-16, 18, 20, 23-25, 27, 31-32, 47, 50-54, 57-62, 87-92, 96-98, 103, 105, 111, 113, 123, 128-129,	A
		1997	10-11, 18-19 23- 25, 27, 31-32, 36- 62, 87, 93, 97-98, 103-104, 106-114, 129	A
		1998	10-11, 18-19, 23- 32, 36, 38, 44, 47- 58, 61-62, 73-77, 87, 93, 97-98, 103- 104, 106-108, 111- 114, 121-125, 129	A
		1999	31-32, 36, 38, 70, 73-77, 87, 93, 97- 98, 107, 113, 118, 121-125	A

		2000	70, 73-77, 118, 121-125,	A
		2001	70, 73-77, 118, 121-125	A
	<b>LEO</b>	1996	12, 14-16, 18-19, 23-25, 27, 82-82, 87, 89, 94-95, 101, 117	A
		1997	10-11, 18-19, 23- 25, 27, 36, 94-96, 101-102	A
		1998	10-11, 18-19, 23- 27, 30-32, 36-39, 42-64, 75, 77-78, 84, 88-89, 94-98, 101-104, 111, 113, 118	A
		1999	31-32, 36-39, 72, 75, 77-78, 96- 98, 103, 108, 111, 113	A
		2000	31-32, 72, 75, 77- 78, 103, 108, 111, 113	A
		2001	31-32, 72, 75, 77- 78, 103, 108, 111, 113	A
	<b>LESOG</b>	1996	12-26, 28, 37-38, 43-54, 95-100, 105-107, 112-116, 120, 136-138	A
		1997	10-11, 19-20, 24- 26, 28, 32-33, 57, 59-61, 65-70, 73, 75-77, 79, 101, 107, 112-113, 120- 123, 138	A
		1998	10-11, 19-20, 24- 28, 31-33, 39, 58- 60, 62, 66-70, 74- 76, 78-79, 89-92, 101, 107, 112-113, 117, 120-123, 130- 133, 138	A
		1999	32-33, 39, 89-92, 117, 122, 130-133	A
		2000	32-33, 89-92, 122, 130-133	A

		2001	32-33, 89-92, 122, 130-133	A
	<b>BSOG</b>	1997	10,27, 69-70	A
		1998	10, 14-18, 21, 23, 27-46, 57, 59-61, 64, 69-70, 83	A
		1999	27, 57, 59-61, 64, 70, 83, 85-87, 90	A
		2000	57, 59-61, 64, 83, 85-87	A
		2001	57, 59-61, 64, 83, 85-87	A
	<b>TAG</b>	1997	10, 51	A
		1998	10, 14-18, 21-23, 27-28, 41-43, 46, 51-53, 56-58, 67- 69, 72	A
		1999	27-28, 36, 41-43, 46, 52-53, 62, 65- 69, 72	A
		2000	36, 39-43, 46, 62, 65-69, 72	A
		2001	39-46, 65-69, 72	A
	<b>EDI</b>	1997	10-11, 14-16, 18, 21, 23, 27-28, 37- 48, 55, 79-84, 86, 99	A
		1998	14-18, 28-34, 38- 44, 48-55, 66, 68- 69, 83, 86, 93, 95	A
		1999	22-23, 66, 68-69, 85, 93, 95	A
		2000	22-23, 66, 68-69, 85, 93, 95	A
		2001	22-23, 66, 68-69, 85, 93, 95	A
	<b>ECTA</b>	1997	11, 21, 23, 51, 56	A
		1998	10-23, 46, 51-52, 55-57, 70	A
		1999	40, 43, 65	A
		2000	40, 43, 65	A
		2001	40, 43, 65	A
	<b>CLEC TAFI</b>	1996	10-14, 19-22, 59- 61, 66-68, 73-82, 99-100	A
		1997	10, 17-18, 20-22, 62, 67-68, 73, 80-	A



			82, 100	
		1998	10, 17-39, 48-49, 52, 54-56, 73, 80-83, 87-88, 92, 94-96	A
		1999	22, 48-56, 82, 87-88, 92-96	A
		2000	22, 56, 82, 88, 92-96	A
		2001	22, 56, 82, 88, 92-96	A
	<b>BILLING</b>	1997	9, 11, 17, 19-20, 26, 40-42, 49-50, 54, 64	A
		1998	9-14, 18-26, 36, 40-42, 49-51, 54-55, 60, 64	A
		1999	35-36, 40-42, 59-60, 64	A
		2000	35-37, 40-42, 44, 59-65	A
	<b>OTHER FUNCTIONS</b>	1997	26-27, 40-41	
		1998	ALL	A
		1999	7-16, 33-34, 40-41	A
		2000	7-16, 33-34	A
		2001	7-16, 33-34	A
	<b>DEVELOPMENT AND IMPLEMENTATION</b>	1996	7, 9, 15, 17, 22-23, 29, 36-40, 44, 94-98, 101-103, 119-121, 126-127, 129-133, 138, 140, 144-146	A
		1997	7-8, 10-12, 15-18, 22-24, 29-30, 36-37, 44-47, 62, 73-74, 77-78, 80, 84, 89, 94, 101-103, 108-109, 113, 119-120, 122-123, 125-127, 129, 134-135, 138, 139-146	A
		1998	7-8, 11, 15-32, 36-37, 41, 44-47, 51-52, 55-56, 58, 62-69, 77, 80, 84-85, 88-94, 101-104, 108-110, 113-114,	A

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		1999	11, 17, 24-32, 36- 37, 41, 46, 52, 63- 64, 79, 103, 125- 128, 140, 146, 149	A
		2000	31, 46, 79, 103, 140, 146, 149	A
		2001	31, 46, 79, 103, 140, 146, 149	A
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		1999	7, 10-14, 18, 21, 23, 31-34, 41, 43- 45, 52-56, 63, 65, 74, 80-88, 92-93, 97, 102-103, 109- 110, 113, 115-118, 125-134, 136	A
		2000	7, 10-14, 18, 21, 23, 31-34, 41, 43- 45, 52-56, 63, 65, 74, 81, 84-88, 92- 94, 97-98, 102- 103, 109-110, 113, 116-136	A
		2001	7, 10-14, 18, 21, 23, 31-34, 41, 43- 45, 52-56, 63, 65, 74, 81, 84-88, 92- 94, 97-98, 102- 103, 109-110, 116- 136	A
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