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Legal Department

NANCY B. WHITE
General Counsel-Florida

99 MAR 25 PM 4:25

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

RECORDS AND
REPORTING

March 25, 1999

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. 920260-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for audit workpapers in connection with the Surveillance Audit; Audit Control No. 98-156-1-1, which we ask that you file 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.

Sincerely,

Nancy B. White

Nancy B. White (BW)

Enclosures

cc: Marshall M. Criser III
William J. Ellenberg II
Michael Buckley, Audit Manager-FPSC

ref DN 03152-99
DOCUMENT NUMBER-DATE
03883 MAR 25 99
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive review of)
revenue requirements and rate)
stabilization plan of Southern)
Bell Telephone and Telegraph)
Company)
_____)

Docket No. 920260-TL

Filed: March 25, 1999

**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 for the audit workpapers in connection with the Surveillance Audit; Audit Control No. 98-156-1-1.

1. In a Memorandum dated March 4, 1999, the Florida Public Service Commission ("Commission"), notified BellSouth that it concluded its fieldwork in the above audit. The audit workpapers produced contain confidential business information.

2. BellSouth is filing this Request for Confidential Classification because the information contained in this response is clearly confidential and proprietary, and therefore, entitled to confidential classification pursuant to Sections 119.07(2)(r) and 364.183, Florida Statutes.

3. BellSouth has appended to this Request for Confidential Classification as "Attachment A" a list of the location in the response of the information designated by BellSouth as confidential.

DOCUMENT NUMBER-DATE

03883 MAR 25 99

FPSC-RECORDS/REPORTING

4. Appended hereto as "Attachment B" are 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.

7. The information provided contains confidential business information. The confidential business information includes employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. This information is confidential pursuant to Section 364.183(3)(f), Florida Statutes. The confidential business information also contains work programs, methodologies and detailed financial information. This information is confidential pursuant to Section 364.183(3)(e), Florida Statutes.

8. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private. This information has not been generally disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an Order declaring the information described above and contained in the indicated portions of the audit workpapers in connection with the Surveillance

Audit; Audit Control No. 98-156-1-1 to be confidential, proprietary business information, and, thus, not subject to public disclosure.

Respectfully submitted this 25th day of March, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (Pw)

MICHAEL P. GOGGIN

c/o Nancy H. Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

ATTACHMENT A

**Florida Public Service Commission
Docket 920260-TL
Staff Audit
Audit Control No. 98-156-1-1
1997 Surveillance Report
Auditors Workpapers and Audit Report
March 25, 1999**

- A. This information contains employee personnel information unrelated to compensation, duties, qualifications, or responsibilities, such information is expressly included in Section 364.183 (3)(f), Florida Statutes, as proprietary confidential business information. This information included employee's social security numbers

- B. This information contains portions of the audit report and supporting workpapers documents containing BellSouth Telecommunications, Inc.'s information relating to the auditing strategy, control, work programs and methodologies used by FPSC Staff Auditors. This information is entitled to confidential classification on the basis that it constitutes the proprietary work product pursuant to Section 364.183(3)(e), Florida Statutes.

- C. This information contains detailed financial information of a non-regulated affiliate of BellSouth Telecommunications, Inc. and is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes. The information is in the form of both billing and operating revenue data. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing and overall business strategies concerning these services. This same information on competitors is not available to BellSouth or BAPCO.

BellSouth Telecommunications, Inc.
 FPSC Staff Audit
 1997 Surveillance Report
 Summary of Proprietary Information
 Included in Auditor Workpapers and Audit Report

Page Number(s)	Line(s)/ Column(s)	Reason Proprietary
11-1 thru 11-10	All	B
11-11	All	A, C
11-12 thru 11-24	All	A, C
11-25 thru 11-28	All	B
11-29 thru 11-31.1	All	A, C
11-34	13,19	A
11-36	19	A
11-37	11,24,31	A
11-38	4,5,6,11,12,15,17,26,28,38	A
11-39	13,19	A
11-41	10,26,32	A
11-42	10,13,14,15,20	A
11-44	13,19	A
11-46	22,23,27,33	A
11-47	13,19	A
11-50	5	C
11-51	3,4,9,12,13,14,15,17,20,21	A
11-52	11,18,24	A
11-53	8,10,11	A
11-54	10,11,20,21,30,31	A
11-56	13,19	A
11-57	13,19	A
11-59	13	A
11-62	11,19,21,33	A
11-66	13,19	A
11-68	13,19	A
11-70	13,19	A
11-73	13,19	A
11-74	7	A
11-76	13,14,18,20,26	A
11-77	4,10,13,24,25	A
11-78	8	A
11-79	3	A
11-80	All	A,C
11-82	13,19	A
11-84	11,22	A
11-86	1	A
11-87	4,9,13,15,18	A
11-93	14,18	A
11-94	5,15	A
11-96	13	A
11-98	7	A
11-99	7	A
11-100	13	A
11-104	7,22	A
11-105	7,30	A
11-106	13,38	A

BellSouth Telecommunications, Inc.
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Page Number(s)	Line(s)/ Column(s)	Reason Proprietary
11-107	2,11,12,13,19,20	A
11-109	2,3,12,16	A
11-110	7,10,12,14,16,18,30	A
11-111	13	A
11-113	8	A
11-114	14	A
11-137	13,19	A
11-140	7,14	A
11-141	8,17,21,24,29,33	A
11-143	13,19	A
11-144	9	A
11-145	7,19	A
11-147	8,13,17,20,25	A
11-149	13	A
11-152	6,13	A
11-153	8,13	A
11-154	10,15	A
11-155	12,18	A
11-156	1,20,25,29	A
11-157	13	A
11-159	2,6,19,31,44	A
11-160	2,6,19,32,45	A
11-161	2,6,22,37,50	A
11-162	13	A
11-163	10,13	A
11-172	16	A
11-174	15,19	A
11-176	9,14,23,46	A
11-178	3	A
11-181	13,19	A
11-183	12,30	A
11-184	5,14,19,22,24,26,34,38,41,43,45,49	A
11-185	12,37,38,39	A
11-188	13	A
11-190	2,14,26	A
11-191	13	A
11-193	12,17,21	A
11-195	13	A
11-197	4,13,21	A
11-198	10	A
11-199	3,4,5,6,44,50	A
11-201	13	A
11-203	7,18,23,32,41,46,52	A
11-204	23	A
11-205	3,19	A
11-207	13	A
11-211	2 thru 8,19	A

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Page Number(s)	Line(s)/ Column(s)	Reason Proprietary
11-212	8,13	A
11-213	17,19,57	A
11-215	15,19	A
11-216	8	A
11-219	15,18	A
11-221	4,9,15,19,27	A
11-223	13,19	A
11-225	20,29,33	A
11-234	12,13	A
11-235	13,19	A
11-240	11	A
11-245	All	A
11-246	All	A
11-256	15 thru 24,27,34,35	A
11-257	7 thru 39,41	A
11-259	2,3,4,7 thru 18	A
11-260	7 thru 11,13,14,15	A
11-263	14 thru 22,26	A
11-264	7 thru 19	A
11-265	2,3,6 thru 11	A
11-266	7,8,10 thru 15	A
11-270	16 thru 24,26	A
11-271	8 thru 14,16	A
11-272	7,9,10	A
11-273	2,3,6 thru 10	A
11-276	17	A
11-277	17,19	A
11-283	12,48	A
11-284	12,48	A
11-285	12,48	A
11-287	20 thru 29,36	A,C
11-288	20 thru 34,41	A,C
11-289	20 thru 31,37	A,C
11-290	20 thru 26,32	A,C
11-291	20 thru 28,34	A,C

A - Company or Employee Confidential Information
 B - Outside auditors workpapers
 C - Another Company Business Confidential Information