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Legal Department

J. PHILLIP CARVER
General Attorney

99 APR -9 PM 4:40

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

RECORDS AND
REPORTING

April 9, 1999

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

980946

Re: Docket Nos. 980946-TL, 980947-TL, 980948-TL,
981011-TL, 981012-TL and 981250-TL

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. Please file this document 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.

Sincerely,


J. Phillip Carver

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
William J. Ellenberg II (w/o enclosures)

DOCUMENT FILED-DATE

0463 | APR-99

IT&C-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 980946-TL, 980947-TL, 980948-TL, 981011-TL,
981012-TI and 981250-TL

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

U.S. Mail this 9th day of April, 1999 to the following:

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J. Phillip Carver

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for temporary waiver of)
Physical collocation requirements set forth)
In the 1996 Telecommunications Act and) Docket No. 980946-TL
The FCC's First Report and Order, for the)
Daytona Beach Port Orange Central Office)
By BellSouth Telecommunications, Inc.)
_____)

In re: Petition for temporary waiver of)
Physical collocation requirements set forth)
In the 1996 Telecommunications Act and) Docket No. 980947-TL
The FCC's First Report and Order, for the)
Boca Raton Boca Teeca Central Office, by)
BellSouth Telecommunications, Inc.)
_____)

In re: Petition for Waiver of Physical)
Collocation Requirements Set Forth)
In the Telecommunications Act of 1996) Docket No. 980948-TL
And the FCC's First Report and Order,)
for the Miami Palmetto Central)
Office, By BellSouth Telecommunications, Inc.)
_____)

In re: Petition for waiver of physical)
Collocation requirements set forth in the)
Telecommunications Act of 1996 and the) Docket No. 981011-TL
FCC's First Report and Order, for the)
West Palm Beach Gardens Central Office,)
By BellSouth Telecommunications, Inc.)
_____)

In re: Petition for waiver of physical)
Collocation requirements set forth in the)
Telecommunications Act of 1996 and the) Docket No. 981012-TL
FCC's First Report and Order, for the)
North Dade Golden Glades Central Office, by)
BellSouth Telecommunications, Inc.)
_____)

DOCUMENT NUMBER-DATE
04631 APR -98
FPSC-RECORDS/REPORTING

In re: Petition for temporary waiver of)
Physical collocation requirements set forth)
In the 1996 Telecommunications Act and)
The FCC's First Report and Order, for the)
Lake Mary Main Central Office, by)
BellSouth Telecommunications, Inc.)
_____)

Docket No. 981250-TL

Date: April 9, 1999

**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 or about December 1, 1999, the Staff of the Florida Public Service Commission ("Commission") commenced Audits relating to the various dockets referenced above. On March 19, 1999, the Staff provided to BellSouth the work papers that it intends to retain along with the Final Audit Report. Accordingly, any Request for Confidential Classification of these documents is due April 9, 1999.

2. BellSouth is filing a Request for Confidential Classification for certain of the information contained in these documents. This information includes, among other things, vendor-specific information, competitive business information, employee personnel information and other trade secrets. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

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

4. BellSouth has appended to this Request as Attachment B two copies of the requested documents with the confidential information redacted.

5. BellSouth has appended to this Request as Attachment C a sealed envelope containing one highlighted copy of the documents having confidential and proprietary information.

6. The requested documents contain information that is confidential and proprietary to BellSouth, and includes information such as, among other things, vendor-specific information, competitive business information, employee personnel information, information which, if disclosed, could compromise the security of the telecommunications network and other trade secrets. 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. Such information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), 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 5th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (for)
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158808

ATTACHMENT A

COLLOCATION INVESTIGATIONS DOCKETS NOS. 980946-TL; 980947-TL; 980949-TL; 981011-TL; And 981012-TL; 981052-TL

Explanation of Proprietary Information

1. This information constitutes trade secrets that relate to the competitive business of BellSouth. The release of this information would potentially damage BellSouth in that it would allow BellSouth's competitors 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(3)(a) and (e).
2. The subject information includes BellSouth's business plans, forecasts and other confidential business information. 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 includes the floor plans of BellSouth central offices. These plans are 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 should be classified as proprietary, confidential business information pursuant to Section 363.183(3)(a) and (c), Florida Statutes.
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 could use this information to develop their own market strategy with which to thwart BellSouth's effort in the market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete. 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 pursuant to Section 364.183(3)(a) and (e).
5. This information is 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. This information is expressly identified 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)(d), Florida Statutes.

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
All Central Offices	4	30-7 / 4	p. 35	2-5; 19, 23; 24; 27; 31; 35	9/25 Letter	7
		30-7 / 4	p. 36	9, 12, 15, 19, 20	9/24 letter	7
		30-10 / 2	3 of 3	1-14	Utilization %	1
		30-10 / 2	p. 1-8	All	All	2
		30-13	p. 1 – p. 3	All	Notes from Jacksonville Meeting	1,2
		30-13 / 2		All	Staff Notes	1,2
		30-14	p. 1	All		1,2
		30-14 / 1	1-15	All	2/5 Meeting notes	1,2
		30-14 / 2	1-6	All	2/5 Meeting notes	1,2
		30-15	1-5	All	Meeting notes	1,2
		30-15	1	All	2/8 Meeting notes	1,2
		30-18	1	1-3	Notes from Meetings	1,2

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
All Central Offices	5	30-19	All	All	Capacity Management Collocation Guidelines	1, 4
		30-20	All	All	Notes from 12/11/96 INAC Collocation Conference Call from 980800 Docket	1
		30-24	1 – p. 5	All	Excerpts from Engineering & Installation Collocation Equipment (TR 73503)	1
		30-25	All	All	Excerpts from BST Practices	1
		30-28 and 30-34	2 – p 41	All	1999 North Florida SCM Planning Guidelines	1, 4
		30-29 / 1	1 – 5	A – E	Regression Output	2
		30-29 / 1-1	1	1-23	Network Access Line Growth	2
		30-29 / 1-1	2	1-22	Network Access Line Growth	2
		30-29 / 1-1	3	2-12; 13-14; 16-17; 19-20	Network Access Line Growth	2
		30-29 / 1-1	4	1-18	Network Access Line Growth	2
		30-29 / 1-1	5	1-32	Network Access Line Growth	2
		30-29 / 1-1 / 1	1 – 6	All	Actuals	2
		30-29 / 1-1 / 1-1	3	1-11	ResPrimAdl	2
		30-29 / 1-1 / 1-2	1-2	All	WC & Turf Market Segment	2
		30-29 / 1-1 / 1-2	3	All	Incr. Total Accl.	2
		30-29 / 1-1 / 1-2	4	All	Incr. Res. Accl	2
		30-29 / 1-1 / 1-2	5	All	Incr. Bus. Accl	2
		30-29 / 1-1 / 1-2	6	All	Incr. Official	2
		30-29 / 1-1 / 1-2	7	All	Incr. Coin	2
		30-29 / 1-1 / 1-2	8	All	Incr Res. Unb. L&P	2
		30-29 / 1-1 / 1-2	9	All	Incr. Busi Unb L&P	2
		30-29 / 1-1 / 1-2	10	All	Insv Res. Accl	2
		30-29 / 1-1 / 1-2	11	All	Insv Bus Accl	2
		30-29 / 1-1 / 1-2	12	All	Insv Official Accl	2
		30-29 / 1-1 / 1-2	13	All	Insv Coin Accl	2
		30-29 / 1-1 / 1-2	14	All	Insv Res Unbl L&P	2
		30-29 / 1-1 / 1-2	15	All	Insv Bus Unbl L&P	2
		30-29 / 1-1 / 1-2 / 1	1 – 2	All	Ratio of Turf to GEO	2
		30-29 / 1-2	1 & 3	A – G	Actuals	2
		30-29 / 1-3	1	2-3; 5-6; 9-10;	Staff notes on Regress	2
		30-33	3 – 27	All	Local Competition Reports	1
		30-34			See 30-28, duplicate	
		30-40			Network Access Forecast Response	2

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
Boca Teeca		16-1	1	All	Floor plan	3,6
		16-2	1	All	Floor plan	3,6
		16-2	2	1-15	Resp. to 28 (1)	1
		16-2	8-9		Strategic Facilities Planning	4
		16-2	10	Col. A&B	Implement Cost	1
		16-2	14	1-4	PSC Inquiry	1
		16-2	3	1-14	Floor plan	3,6
		16-2	4	1-9	Response to Req 28 (1)	3,6
		16-4	1		Notes from K Welch	1
		19-3	1-5	All	TEO Schedule Screen	1,6
		19-2	1-2	All	Battery Forecast	2
		16-2	14, 16, 17	All	Switch Equipment	1
		19-3	1	All	Battery forecast	2
Boca Teeca	7	26-1	1-18	All	D&F Charts	2,4
		26-1 / 1	1	All	Actuals	2,4
		26-1 / 2	1-2	All	MHAT	2,4
		26-1 / 2	3-4	All	View Over View Comparison	2,4
		26-1 / 3	1	Common User ID Manager CUID	Employee Information	5
		26-2	1	All	Circuit Projects by bay	2
		26-2 / 1	1-3	All	Total DSX1 Trunks	2
		26-2 / 2	2-9	All	Circuit Equipment Data	2
		26-2 / 3	1-8	All	Circuit Equipment Data	2
		26-3	1-7	All	Battery Plan Forecasts	2
		26-4	1-6, 8-16 18-22	All	Equipment Inventory	2
		26-5	1-9	All	Single CLLI Report	2
		27-1	1	1-22	Employee Info.	5
		27-1	2	1-21	Employee Info.	5
		27-1	4-6	All	Job Description	5
		27-1 / 1	1	All	Floor plan	3,6

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
Daytona – Port Orange	—	19-1	1-4	All	Telephone Equipment Orders (TEO)	1,6
		19-1	1	5-11; 19-22; 25-28; 35-37	TEO	1,6
		19-1	2	4; 7-13; 17-25; 27-29	TEO	1,6
		19-1	3	6-12; 20-23; 26-29; 36-38	TEO	1,6
		19-1	4	2-3; 5-9; 11-14	TEO	1,6
		19-2	1	4-12; 19-23; 25-29; 32-36; 38-42	TEO	1,6
		19-2	3	4; 11-19; 21-24; 26-31; 33-35; 37-41; 45	TEO	1,6
		19-2	4	1; 6-15; 17-18; 20-38; 40-44; 48	TEO	1,6
		19-2	5	1; 7-9; 11-13; 15-17; 19-25; 27-41; 45	TEO	1,6
		19-2	6	1; 6-13; 15-28; 30-35; 37-42	TEO	1,6
		19-2	7	1; 7-13; 15-17; 18-19; 23-24	TEO	1,6

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
Daytona – Port Orange		19-2	8	1; 7-33; 37	TEO	1,6
		19-2	9	2; 6-48; 52	TEO	1,6
		19-2	10	2; 4-49; 52	TEO	1,6
		19-2	11	2; 4-49	TEO	1,6
		19-2	12	2; 4-49; 53	TEO	1,6
		19-2	13	2; 4-53	TEO	1,6
		19-2	14	2; 4-49; 53	TEO	1,6
		19-2	15	2; 4-49; 53	TEO	1,6
		19-2	16	2; 5-50; 54	TEO	1,6
		19-2	17	2; 5-25; 29	TEO	1,6
		19-2	18	2; 6-31; 41	TEO	1,6
		19-2	19	1-2; 6-12; 13-14; 18	TEO	1,6
		19-2	21	1; 4-7; 9-10; 21-17; 19-21; 23-43; 47	TEO	1,6
		19-2	22	1; 4-25; 27-33; 35-47; 51	TEO	1,6
		19-2	23	1; 4-12; 14-49; 53	TEO	1,6
		19-2	24	1; 4-10; 12-13; 5-31; 33-38; 40-43; 47	TEO	1,6
		19-2	25	1; 4-7; 9-25; 27-47; 51	TEO	1,6
		19-2	26	1; 5-12; 14-47; 51	TEO	1,6
		19-2	27	1; 5-6; 8-15; 17; 19; 21-29; 31-32; 34-37; 41	TEO	1,6
		19-2	28	1; 4-41; 43; 45-47; 51	TEO	1,6
		19-2	29	1; 4-9; 11-31; 3-47; 51	TEO	1,6
		19-2	30	1; 4-13; 15-46; 51	TEO	1,6

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
Daytona Port Orange		19-2	31	1; 4-7; 9-19; 21-47; 51	TEO	1,6
		19-2	32	1; 4-51; 55	TEO	1,6
		19-2	33	1; 4-51; 55	TEO	1,6
		19-2	34	1; 4-51; 55	TEO	1,6
		19-2	35	1; 4-51; 55	TEO	1,6
		19-2	36	1; 4-51; 55	TEO	1,6
		19-2	37	1; 4-6; 8-49; 53	TEO	1,6
		19-2	38	1; 4-51; 55	TEO	1,6
		19-2	39	1; 4-51; 55	TEO	1,6
		19-2	40	1; 4-51; 55	TEO	1,6
		19-2	41	1; 4-51; 55	TEO	1,6
		19-2	42	1; 4-51;	TEO	1,6
		19-2	43	1; 4-5; 7; 9-47; 51	TEO	1,6
		19-2	44	1; 4-7; 8-9; 13	TEO	1,6
		19-2	45	1; 3; 21; 36-37; 41	TEO	1,6
		19-2	46	1; 3; 4-5; 9	TEO	1,6
		19-2	47	1; 6-39; 43	TEO	1,6
		19-2	48	1; 4-5; 7; 9-47; 51	TEO	1,6
		19-2	49	1; 3; 23; 37-38; 42	TEO	1,6
		19-3	1	6-8; 10-13; 21-24; 27-30; 37-38	TEO	1,6
		19-3	2	4; 7-19; 23-43	TEO	1,6
		19-3	3	5; 11-56	TEO	1,6
		19-4	1	5; 6-8; 10-12; 20-24; 34-37; 39-43	TEO	1,6
		19-4	2	7; 10-25	TEO	1,6
		19-4	3	7; 9-11; 13-28; 31-32	TEO	1,6
		19-4	4	7-53	TEO	1,6

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
Daytona Port Orange		19-4	5	5-13; 20-21; 26-30; 39-42	TEO	1,6
		19-4	6	7; 9-13; 15-19; 21-28; 30-33; 35-36	TEO	1,6
		19-4	7	5-8; 10-13; 20-24; 27-31; 34-37; 39-49	TEO	1,6
		20-6	1	1-20	Transmission Report	2
		20-6	2	1-13	Equipment Additions	2
		20-7	2	1-8	Forecasts	2
		20-8	2-22	All	Battery Forecast	2
		20-9	1	11-15	Battery Forecast	2
		20-9	2	12-17	Battery Forecast	2
		20-9	3	12-17	Battery Forecast	2
		20-9	4	12-17	Battery Forecast	2
		20-9	5	12-17	Battery Forecast	2
		20-9	6	12-17	Battery Forecast	2
		20-9	7	12-14	Battery Forecast	2
		20-9	8	9-15	Battery Forecast	2
		20-9	9	9-12	Battery Forecast	2
		20-9	10	8-14	Battery Forecast	2
		20-9	11	9-15	Battery Forecast	2
		20-9	7	12-14	Battery Forecast	2
		20-9	8	9-15	Battery Forecast	2
		20-9	9	9-12	Battery Forecast	2
		20-9	10	8-14	Battery Forecast	2
		20-9	11	9-15	Battery Forecast	2
		20-10	1	1-23	Employee Info	5
		20-10	2	1-21	Employee Info	5
		20-10	4-6	All	Job Descriptions	5

Central Office	Staff Binder #	Staff WorkPaper Item #	Page #	Line / Column #	BST Document Identification	Proprietary Reason
North Dade Golden Glades	6	16	1	All	Floor plan	3,6
	6	16	2	All	Floor plan	3,6
North Dade Golden Glades	7	19-1 / 1	1	4,5,7,9,10, 13, 17, 20, 22, 25, 28, 30-33, 36,37	Work Request	2,6
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		19-5	2	4-26	Equipment Growth Summary	2
		19-6	1	1-8	Equipment Growth	2
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		19-7	2	1-25	Forecasted Equip Growth	2
		19-8	1	1,2,4-20,28-30	Building Space Plan	2
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			3		97-98 Circuit Project	1
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			9		97-98 Circuit Project	1
			10		97-98 Circuit Project	1
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		25-3	1		Power Circuit	1
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			7		Power Circuit	1
			8		Power Circuit	1
			9		Power Circuit	1
			10		Power Circuit	1
			11		Power Circuit	1
			12		Power Circuit	1
			13		Power Circuit	1
			14		Power Circuit	1
			15		Power Circuit	1
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