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Legal Department

J. PHILLIP CARVER  
General Attorney

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

RECORDS AND  
REPORTING

April 30, 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 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.

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

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 NUMBER-DATE

05522 APR 30 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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 )  
Daytona Beach Port Orange Central Office )  
By BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 980946-TL

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 )  
Boca Raton Boca Teeca Central Office, by )  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 980947-TL

In re: Petition for Waiver of Physical )  
Collocation Requirements Set Forth )  
In the Telecommunications Act of 1996 )  
And the FCC's First Report and Order, )  
for the Miami Palmetto Central )  
Office, By BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 980948-TL

In re: Petition for waiver of physical )  
Collocation requirements set forth in the )  
Telecommunications Act of 1996 and the )  
FCC's First Report and Order, for the )  
West Palm Beach Gardens Central Office, )  
By BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 981011-TL

In re: Petition for waiver of physical )  
Collocation requirements set forth in the )  
Telecommunications Act of 1996 and the )  
FCC's First Report and Order, for the )  
North Dade Golden Glades Central Office, by )  
BellSouth Telecommunications, Inc. )  
\_\_\_\_\_ )

Docket No. 981012-TL

DOCUMENT NUMBER-DATE

05522 APR 30 88

FPSC-RECORDS/REPORTING

In re: Petition for temporary waiver of	)	
Physical collocation requirements set forth	)	
In the 1996 Telecommunications Act and	)	Docket No. 981250-TL
The FCC's First Report and Order, for the	)	
Lake Mary Main Central Office, by	)	
BellSouth Telecommunications, Inc.	)	Date: April 30, 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 April 2, 1999, BellSouth filed a "blanket" Notice of intent to Request Specified Classification for all of the direct testimony which was to be filed on April 7, 1999. As stated in the Notice of Intent, BellSouth anticipated that the direct testimony of certain parties would include proprietary confidential information. On that same day, BellSouth sent a letter to all Intervenors in the document, which requested that they provide testimony that may contain proprietary information only to parties that have executed confidentiality agreements. Some of the testimony that was subsequently filed did contain proprietary, confidential information.

2. BellSouth is filing a Request for Confidential Classification for some of the information contained in the testimony of certain witnesses (as described more fully in Attachment A hereto). This information includes, among other things, customer-specific information, competitive business 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 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 competitive business 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 harm the competitive interests of BellSouth, potentially compromise the security of BellSouth's network, and possibly damage other companies who are customers of BellSouth, and whose proprietary information is included. 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.

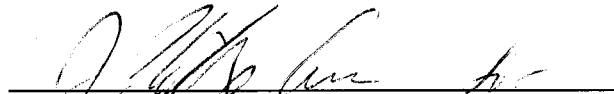
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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 requests that the Commission enter an order declaring the information described above to be proprietary business information that is entitled to confidential classification.

Respectfully submitted this 5th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**CERTIFICATE OF SERVICE**

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

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

U.S. Mail this 30th day of April, 1999 to the following:

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J. Phillip Carver

# **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. 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 offices 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.
3. 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).
4. This information contains customer specific information that is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.



## ATTACHMENT A

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

Direct Testimony of	Page #	Line, Item # or Column #	BST Document Identification	Proprietary Reason
<b>Ruth Young</b>	RKY-2 pp. 18-19	14,15,17,18	Miami Palmetto Floor Plan	2,4
	RKY-4 p. 2	4	Memorandum	4
	RKY-4 p. 4	6	Memorandum	4
	RKY-4 pp. 38-78	Entire Document	Capacity Management Collocation Guidelines	1, 3
<b>Kathy Welch</b>	KLW-4 p. 4	Entire Floor Plan	Miami Palmetto Floor Plan	2,4
	KLW-4 p. 6	Entire Floor plan	Miami Palmetto Floor Plan	2,4
<b>Ronald W. Beasley</b>	RB-1	A,B,C,D	Miami Palmetto Floor Plan	2,4
<b>Michael D. West</b>	Exhibits	A,B,D,E	Miami Palmetto Floor Plans	2,4