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Legal Department

J. PHILLIP CARVER
General Attorney

17 JUL 15 PM 4:15

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

RECORDS AND
REPORTING

July 15, 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. 990149-TP

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.

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FPSC BUREAU OF RECORDS

Sincerely,



J. Phillip Carver (Bw)

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
R. Douglas Lackey

X-ref DN 07697-99
DOCUMENT NUMBER-DATE

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FPSC BUREAU OF RECORDS

CERTIFICATE OF SERVICE
Docket No. 990149-TP

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

U.S. Mail this 15th day of July, 1999 to the following:

Catherine Bedell
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Tel. (850) 413-6226
Fax. (850) 413-6227

Mr. James P. Campbell
MediaOne Florida
Telecommunications, Inc.
7800 Belfort Parkway
Suite 270
Jacksonville, Florida 32256-6925
Tel. (904) 619-5686
Fax. (904) 619-0342

William B. Graham
Graham & Moody
101 North Gadsden Street
Tallahassee, Florida 32301
Tel. (850) 222-6656
Fax. (850) 222-7878
Atty. for MediaOne

Susan Keesen
Dick Karre
MediaOne Group, Inc.
5613 DTC Parkway
Suite 800
Englewood, Colorado 80111
Tel. (303) 858-3566
Fax. (303) 858-3487



J. Phillip Carver *(JC)*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MediaOne Florida)
Telecommunications, Inc. for)
Arbitration of an interconnection) Docket No. 990149-TP
Agreement with BellSouth)
Telecommunications, Inc. pursuant)
to Section 252(b) of the) Filed: July 15, 1999
Telecommunications Act of 1996)
_____)

**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 June 24, 1999, BellSouth filed its Responses to the Second Set of Interrogatories and Second Request for the Production of Documents filed in this docket by the Florida Public Service Commission Staff ("Staff"). 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. BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the specific location in both the interrogatory response and the responsive documents of the confidential

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information. Attachment A also contains the specific justification for the request for confidential classification

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

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

5. 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, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d) Florida Statutes and is exempt from the Open Records Act.

6. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. BellSouth is not able to obtain its competitors' costs to provide service. Therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. For these reasons, the public disclosure of the information would impair the competitive business of BellSouth, and the information is, therefore, entitled to

confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183 Florida Statutes and is exempt from the Open Records Act.

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 information that is not subject to public disclosure.

Respectfully submitted this 15th day of July, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

(Per)

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5555

R. Douglas Lackey

R. DOUGLAS LACKEY

J. PHILLIP CARVER

675 W. Peachtree Street

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ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S 2ND INTERROGATORY NO. 20 AND STAFF'S 2ND REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6 FILED JUNE 4, 1999, IN DOCKET 990149-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, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d) Florida Statutes and is exempt from the Open Records Act.
- B. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. BellSouth is not able to obtain its competitors' costs to provide service. Therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. For these reasons, the public disclosure of the information would impair the competitive business of BellSouth, and the information is, therefore, entitled to confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183 Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S 2ND INTERROGATORY NO. 20 AND STAFF'S 2ND REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6 FILED JUNE 4, 1999, IN DOCKET 990149-TP

INTERROGATORY NO. 20

Lines 1-19	Recurring Column Initial Column Subsequent Column	B
Lines 23,24	Nonrecurring Column Per Query Equivalent Column	B
Lines 25-27		B

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S 2ND **INTERROGATORY NO. 20 AND STAFF'S 2ND REQUEST FOR PRODUCTION** **OF DOCUMENTS NO. 6 FILED JUNE 4, 1999, IN DOCKET 990149-TP**

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6

BellSouth CNAM SERVICE COST STUDY

PAGE	LOCATION	PROPRIETARY REASON
1	Lns. 43-45, Column: Amount	A
	Lns. 49-52, Column: Amount	B
	Lns. 54-56, Column: Amount	B
	Ln. 58, Column: Amount	B
2	Ln. 62 & 63, Column: Amount	A
4	Ln. 11, Column: Amount	A
	Lns. 13 & 14, Column: Amount	B
	Lns. 18-20, Column: Amount	B
	Lns. 27-28, Column: Amount	A
5	Ln. 6-7, Column: Amount	B
	Ln. 22, Column: Amount	A
	Lns. 24-25, Column: Amount	A
14	Lns. 6-9, Column: Amount	B
15	Ln. 30, Column: Amount	B
16	Ln. 58-61, Column: Amount	B
	Ln. 78, Column: Amount	A
	Ln. 82, Column: Amount	B
17	Ln. 9-11, Column: Amount	A
	Ln. 14-16, Column: Amount	B
	Ln. 25-28, Column: Amount	B
	Ln. 34, Column: Amount	A
19	Ln. 2-4, Column: Amount	A
	Ln. 9-10, Column: Amount	A
20	Ln. 5-6, Column: Amount	A
	Ln. 20, Column: Amount	B
	Lns. 22-23, Column: Amount	B

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REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6

BellSouth AIN SMS ACCESS SERVICE

PAGE	LOCATION	PROPRIETARY REASON
1	Ln. 26, Column: Value	A
	Lns. 28-29, Column: Value	B
	Lns. 34-36, Column: Value	A
	Lns. 43-44, Column: Value	A
9	Lns. 2-4, Column: Value	A
	Ln. 7, Column: Value	A
	Ln. 9-10, Column: Value	A
	Ln. 18-19, Column: Value	A

BellSouth SS7 Fundamentals

PAGE	LOCATION	PROPRIETARY REASON
1	Lns. 8- 11, Column: A	B
	Lns. 16-20, Column: B	B
	Lns. 30-33, Column: B	B
3	Lns. 9-11, Columns A, B, (A)(B)	B
	Lns. 13-16, Column B	B
	Lns. 21-24, Column B	B
	Ln. 38, Columns A, B, (A)(B)	B
4	Ln. 10-17, Column B	B
	Ln. 22, Columns A, B	B
	Lns. 27-28, Columns A, C, (A)*(B)*(C)	B
	Ln. 33, Columns A, C, (A)*(B)*(C)	B
	Ln. 37, Column B	B
	Ln. 38, Columns A & B	B

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BellSouth Operational Support Systems – Billing – CNAM

PAGE	LOCATION	PROPRIETARY REASON
2	Ln. 63, Column A	B
	Ln. 70-71, Column B	B
	Ln. 88, Column B	B
	Ln. 94, Column B	B
3	Ln. 168, Column B	B
4	Lns. 5-6, Column: Amount	B
	Lns. 15-16, Column: Amount	B
	Lns. 24-26, Column: Amount	B
	Lns. 34-36, Column: Amount	B
	Ln. 42, Column: Amount	B
	Ln. 45, Column: Amount	B
	Ln. 49, Column: Amount	B
	Ln. 52, Column: Amount	B
7	Ln. 162-164, Column: 1997	B
	Ln. 172-174, Column: 1997	B
	Ln. 176-179, Column: 1997	B
8	Ln. 253, Column: 1997	B
	Ln. 255-256, Column: 1997	B