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Legal Department

J. PHILLIP CARVER  
General Attorney

JUL 22 PM 4: 29

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

July 22, 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**

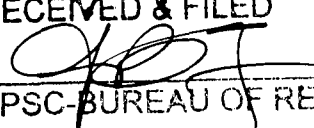
Dear Ms. Bayó:

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.

RECEIVED & FILED

Sincerely,

  
FPSC-BUREAU OF RECORDS

  
J. Phillip Carver

Enclosures

AFA	_____	cc: All parties of record
APP	_____	
CAP	_____	M. M. Criser, III
CMU	_____	N. B. White
CTR	_____	R. Douglas Lackey
EAG	_____	
LEG	_____	
MAS	_____	
OPC	_____	
RRR	_____	
SEC	<input checked="" type="checkbox"/>	
WAW	_____	
OTH	_____	

x-ref 08023-99  
DOCUMENT NUMBER-DATE

08703 JUL 22 99

FPSC-RECORDS-REPORTING

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 22, 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 July 2, 1999, BellSouth filed its Responses to the Fourth Set of Interrogatories and Fourth 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 locations of the confidential information in both the interrogatory response and in the responsive

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documents. 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.

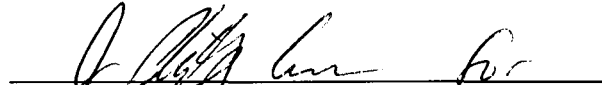
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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.

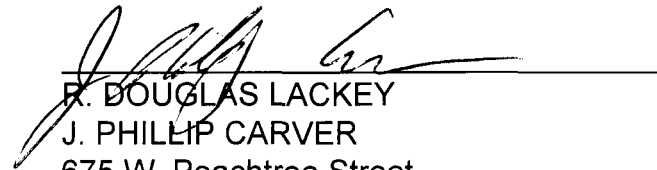
Respectfully submitted this 22nd day of July, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



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NANCY B. WHITE  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5555



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F. DOUGLAS LACKEY  
J. PHILLIP CARVER  
675 W. Peachtree Street  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0710

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**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 22nd 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

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990149-TP  
Request for Confidential Classification  
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7/23/99**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S 4<sup>th</sup> INTERROGATORY NO. 33 AND STAFF'S 4<sup>th</sup> REQUEST FOR PRODUCTION OF DOCUMENTS NO. 14 FILED July 2, 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.

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 990149-TP  
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## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S 4<sup>th</sup> INTERROGATORY NO. 33 AND STAFF'S 4<sup>th</sup> REQUEST FOR PRODUCTION OF DOCUMENTS NO. 14 FILED JULY 2, 1999, IN DOCKET 990149-TP

### INTERROGATORY NO. 33

Item:	<u>Reason</u>
(b) Access Terminal Number	A

### REQUEST FOR PRODUCTION OF DOCUMENTS NO. 14

		<u>Reason</u>	
Page 5	Line 15	Columns B,E	A
	Line 21	Column E	A
	Line 22	Column F	A
	Line 32	Column F	A