

MICHAEL P. GOGGIN  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
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Tallahassee, Florida 32301  
(305) 347-5561

ORIGINAL

August 23, 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. 990691-TP (ICG Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification, which we ask that you file in the above-referenced matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*Michael P. Goggin* (KR)  
Michael P. Goggin

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey

DN 09079-99  
DOCUMENT NUMBER-DATE  
10049 AUG 23 99  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE  
Docket No. 990691-TP**

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

U.S. Mail this 23rd day of August, 1999 to the following:

C. Lee Fordham  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

ICG Telecom Group, Inc.  
Mr. Carl Jackson  
50 Glenlake Parkway, Suite 500  
Atlanta, GA 30328  
Tel. No. (678) 222-7342  
Fax. No. (678)222-7413  
Represented by McWhirter Law Firm

McWhirter Law Firm  
Joseph McGlothlin  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Represents ICG

  
Michael P. Goggin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of: ) Docket No. 990691-TP  
)  
Petition by ICG TELECOM GROUP, INC. )  
for Arbitration of an Interconnection )  
Agreement with BELLSOUTH )  
TELECOMMUNICATIONS, INC. Pursuant to )  
Section 252(b) of the Telecommunications )  
Act of 1996. )  
\_\_\_\_\_ ) Filed: August 23, 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, and states the following.

1. On August 2, 1999, BellSouth Telecommunications, Inc. filed a Notice of Intent to Request Confidential Classification for an exhibit (DDC-1) that was attached to the direct testimony of D. Daonne Caldwell. Ms. Caldwell's direct testimony was also filed on August 2, 1999. Attached to that testimony was a cost study that contained vendor-specific pricing information and confidential business information that is considered proprietary to BellSouth.

2. BellSouth is now filing a Request for Specified Confidential Classification for the subject information because the information contained in the exhibit is proprietary to BellSouth and includes information containing, among other things, vendor-specific pricing information and confidential business information.

DOCUMENT NUMBER-DATE

10049 AUG 23 8

FPSC-RECORDS/REPORTING

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

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.

6. The exhibit DDC-1 is a cost study that contains information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, vendor-specific pricing and confidential business information. 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. Therefore, such information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, 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 Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

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 23rd day of August, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (KR)

NANCY BOWHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

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(305) 347-5558

R. Douglas Lackey (KR)

R. DOUGLAS LACKEY

E. EARL EDENFIELD, JR.

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## ATTACHMENT A

BellSouth Telecommunications, Inc.  
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### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF A COST STUDY FILED AS AN ATTACHMENT TO THE TESTIMONY OF DAONNE CALDWELL ON AUGUST 2, 1999, IN DOCKET 990691-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

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<u>PAGE NO.</u>	<u>ITEM</u>	<u>BASIS FOR REQUEST</u>
000128	Column E, Lines 7, 8, 10,13, 14, 16, 19, 20, 22, 25,26,28, 31, 32, 34, 37, 38, 40, 44, and 45	1
000129	Column E, Lines 49, 51, 52, 55, 56, 57, 61, 62, 63, 67, 68, 71, 72, 75, 76, 78, 81, 82, 84, 87, 88, and 90	1
000130	Column E, Lines 93, 94, 96, 99, 100, 102, 105, 106, 108, 111, 112, 114, 118, 119, 123, 125, 126, 129, 130, and 131	1
000131	Column E, Lines 135, 136, 137, 141, 142, 145, 146, 149, 150, 152, 155, 156, 158, 161, 162, 164, 167, 168, 170, 173, 174, and 176	1
000132	Column E, Lines 179, 180, 182, 185, 186, 188, 192, 193, 197, 199, 202, 203, 208, 209, 213, 214, 219, and 220	1
000133	Column E, Lines 223, 224, 228, 229, 233, 234, 239, 240, 245, 246, 249, 250, 253, 254, 259, 260, 263, and 266	1
000134	Column E, Lines 267, 271, 274, 275, 279, Columns E, F, and G, Lines 282 through 289 Columns E, F, and G, Lines 304, through 306	1
000144	Lines 2, 4, 8, 15, 17, 21, 28, 30, 34, 41, 43, and 46	1
000145	Lines 52, 54, 58, 65, 67, 71, 80, 82, 89, 93, and 95	1

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<u>PAGE NO.</u>	<u>ITEM</u>	<u>BASIS FOR REQUEST</u>
000146	Lines 102, 104, 105, 113, 114, 115, 121, 123, 131, 133, 141, and 143	1
000147	Lines 2, 4, 8, 15, 17, 21, 28, 30, 34, 41, 43, and 46	1
000148	Lines 52, 54, 58, 65, 67, 71, 80, 82, 89, 93, and 95	1
000149	Lines 102, 104, 105, 113, 114, 115, 121, 123, 131, 133, 141, and 143	1
000150	Lines 3, 5, 8, 15, 17, 20, 27, 29, 32, 39, 41, and 44	1
000151	Lines 53, 55, 58, 65, 67, 70, 79, 81, 89, and 93	1
000152	Lines 103 and 105	1
000153	Lines 3, 5, 15, 17, 27, 29, 39, and 41	1
000154	Lines 53, 55, 65, 67, 91, and 93	1
000155	Lines 103, 105, 113, 115, and 125	1
000156	Lines 3, 4, 8, 12, 13, 18, 22, 23, and 28	1
000157	Lines 3, 4, 5, 6, 11, 12, 13, 15, 16, 17, 18, and 19	1
000158	Lines 25 through 30	1

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<u>PAGE NO.</u>	<u>ITEM</u>	<u>BASIS FOR REQUEST</u>
000159	Column D	1
000160	Column D	1
000161	Columns D and K	1
000162	Lines Florida NFL, SEFL, SFL, And Total	1
000162	Slots on Switch, Utilization, DS1 on 10P, DS1 Util on Patch Panel	1
000163	Columns C and K	1