

Bennett L. Ross
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
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ORIGINAL

RECEIVED FPSC
53 OCT 18 PM 4:19
RECORDS AND REPORTING

October 18, 1999

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

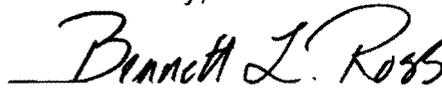
Re: Docket No. 990750-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for 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,



Bennett L. Ross 

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

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. ~~12733-99~~ No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

RECEIVED & FILED



FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12732 OCT 18 99

FPSC-RECORDS/REPORTING

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

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

6. 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 18th day of October, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
c/o Nancy Sims
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Tallahassee, Florida 32301
(305) 347-5555



R. DOUGLAS LACKEY
BENNETT L. ROSS
675 W. Peachtree Street
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Atlanta, Georgia 30375
(404) 335-0710

CERTIFICATE OF SERVICE
Docket No. 990750-TP

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

U.S. Mail this 18th day of October, 1999 to the following:

Diana Caldwell
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6175
Fax. No. (850) 413-6176

Ms. Parkey Jordan
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BellSouth Center
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Bennett L. Ross (for)

*Signed a Protective Agreement

Nanette S. Edwards, Esq. *
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J. Andrew Bertron, Jr.
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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990750-TP
Request for Confidential Classification
Page 1
10/18/99**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES,
INTERROGATORY NO. 12 AND BELLSOUTH'S RESPONSE TO STAFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 3 FILED
SEPTEMBER 27, 1999, IN DOCKET 990750-TP**

Explanation of Proprietary Information

REASON: A

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, therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. In addition, 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 364.183, Florida Statutes and is exempt from the Open Records Act.

REASON: B

This information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990750-TP
Request for Confidential Classification
Page 1
10/18/99**

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INTERROGATORY NO. 12

<u>Line Nos.</u>	<u>Reason</u>
1 and 4	B

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990750-TP
Request for Confidential Classification
Page 2
10/18/99

POD NO. 3

PAGE NUMBER	LOCATION	PROPRIETARY REASON
1	Whole page	A
8	Contracted Services	B
9	Contracted Labor, Andersen	B
10	Item No. 4	B
11	Contracted Services	B
12	Contracted Services, Andersen	B
13	Item No. 4	B
14	Contracted Services	B
15	Contracted Labor, Andersen	B
16	Item No. 4	B
18	Contracted Labor, Andersen	B
19	Item No. 4	B
21	Contracted Labor, Andersen	B
23	Contracted Services	B
24	Contracted labor, Andersen	B
25	Item No. 4	B
26	Contracted Services	B
27	Contracted Labor, Andersen	B
28	Item No. 4	B
29	Contracted Services	B
30	Contracted labor, Andersen	B
31	Item No. 4	B
33	Contracted Services, Contracted Labor, Andersen	B
35	Labor Rate	B
37	Contracted Labor	B
43 - 54	Average Hours/Rates, RE, Montetary Amount	B
56	Contracted Labor	B
59-60	Contract Rates	B
61	Contractors	B
63, 65, 67	2c & 2d	B
69	1996, 1997, 1998	B