

ORIGINAL

Legal Department

NANCY B. WHITE
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

RECEIVED-FPSC

99 OCT 29 PM 4:49

RECORDS AND
REPORTING

October 29, 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. 980119-TP (Supra Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification in connection with Staff's First Set of Interrogatories (Nos. 1, 3, 4 and 6) dated September 24, 1999.

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,

Nancy B. White (NR)
Nancy B. White

cc: All parties of record
Marshall M. Criser III
R. Douglas Lackey

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 1331-99 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.

DOCUMENT NUMBER-DATE

~~13330~~ OCT 29 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 980119-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by *Hand Delivery and U.S. Mail this 29th day of October, 1999 to the following:

Beth Keating *
Legal Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Tel No. (850) 413-6212
Fax No. (850) 413-6250

Mark E. Buechele, Esquire
General Counsel for Supra
2620 S.W. 27th Avenue
Miami, FL 33133

Nancy B. White (ke)
Nancy B. White

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Supra)
Telecommunications and Information)
Systems, against BellSouth)
Telecommunications, Inc. for)
violation of the)
Telecommunications Act of 1996;)
petition for resolution of)
disputes as to implementation)
and interpretation of)
interconnection, resale and)
collocation agreements; and)
petition for emergency relief.)
_____)

Docket No.: 980119-TP

Filed: October 29, 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 October 29, 1999, BellSouth filed its Responses to the Staff of the Florida Public Service Commission ("Staff's") First Set of Interrogatories.

2. BellSouth is now filing a Request for Specified Confidential Classification for the subject information because the information contained in Interrogatory Nos. 1, 3, 4, and 6 is proprietary to BellSouth and includes information containing, among other things, customer specific information.

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.

DOCUMENT NUMBER-DATE

13330 OCT 29 89

FPSC-RECORDS/REPORTING

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. Interrogatory Nos. 1, 3, 4, and 6 contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, customer-specific information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would provide competitors with an unfair advantage. This same information on competitors is not available to each other. This information is valuable 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 29th day of October, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (ke)

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey (ke)

R. DOUGLAS LACKEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 980119-TP
Request for Confidential Classification
Page 1 of 2
10/29/99**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES,
INTERROGATORY NOS. 1, 3, 4 and 6 FILED OCTOBER 29, 1999, IN
DOCKET 980119-TP**

Explanation of Proprietary Information

1. The information is proprietary to BellSouth and includes information containing customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 980119-TP
Request for Confidential Classification
Page 2 of 2
10/29/99**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES,
INTERROGATORY NOS. 1, 3, 4 and 6 FILED OCTOBER 29, 1999, IN
DOCKET 980119-TP**

INTERROGATORY NO. 1

	<u>Reason</u>
RESPONSE (d)	1

INTERROGATORY NO. 3

RESPONSE	1
----------	---

INTERROGATORY NO. 4

RESPONSE	1
----------	---

INTERROGATORY NO. 6

RESPONSE	1
----------	---