

RECEIVED-FPSC

Legal Department

MICHAEL P. GOGGIN
General Attorney

00 FEB -8 PM 4:39

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

RECORDS AND
REPORTING

ORIGINAL

February 8, 2000

*Kg, I called
BS/Tanya. We
only got related
version of POB
No 3. Not 4.
Liu*

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. 991267-TP (Global NAPS Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Global NAPs, Inc.'s First Set of Discovery (Request for Production Nos. 3 and 4(c)), which we ask that you file in the captioned docket.

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
Michael P. Goggin (sa)

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

752-00 x-ref 00689-00)

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 01752-00. 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

01751 FEB-88

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:)	Docket No. 991267-TP
)	
Complaint of Global NAPs, Inc., against)	
BellSouth Telecommunications, Inc. for)	
Enforcement of Section VI(B) of its)	
Interconnection Agreement with BellSouth)	
Telecommunications, Inc. and Request for Relief)	
_____)	Filed: February 8, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, *Florida Administrative Code*, hereby files its Request for Specified Confidential Classification, and states:

1. On December 17, 1999, Global NAPs, Inc. ("Global NAPs") served its First Set of Interrogatories, First Request for Production of Documents and First Request for Admissions to BellSouth. On December 27, 1999, BellSouth filed its General Objections to that discovery and on January 18, 2000, BellSouth served its Responses and Objections to that discovery along with a Notice of Intent.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's responses to Request for Production Nos. 3 and 4(c) includes customer proprietary information and business proprietary information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Section 364.24 and Section 364.183.

3. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

4. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents including those portions that are confidential and proprietary.

6. The information contained in BellSouth's response to Request for Production Nos. 3 and 4(c) includes information containing, among other things, customer proprietary information and business proprietary 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 in future negotiations. This same information on competitors is not available to BellSouth. The information discussed in this Request for Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as customer proprietary information and proprietary, confidential business information pursuant to Section 364.24 and 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 respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 8th day of February, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (BW)
MICHAEL P. GOGGIN
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196263

ATTACHMENT A

**BellSouth Telecommunications, Inc.
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2/8/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSES TO GLOBAL NAP'S FIRST REQUEST FOR PRODUCTION
NOS. 3 AND 4(C) FILED JANUARY 18, 2000, IN FLORIDA DOCKET NO.
991267-TP**

Explanation of Proprietary Information

1. This information is considered by BellSouth to be employee personnel information unrelated to compensation, duties, qualifications or responsibilities. This information is a name and/or control number used to identify an employee in lieu of a social security number. Such information is expressly included in Section 364.183(3)(f), Florida Statutes, as proprietary confidential business information.
2. This information is proprietary to BellSouth and includes information containing customer proprietary and business proprietary information. The Commission has always zealously protected customer proprietary and business proprietary 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 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

ATTACHMENT A

BellSouth Telecommunications, Inc.
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POD NO. 3

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13		1, 2	1
17	Entire Page		2
18		1-25	2
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37		1, 2	1
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43	Entire Page		2
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65		1, 2	1
66		1-11	2
		13-54	2
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		25-60	2

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88		1-25	2
		27-64	2
105		1-4	1
106		1	1
110		1-25	2
		27-64	2
123		1-4	1
124		1	1
138		1-4	1
139		1	1

POD NO. 4

Entire Document

**CERTIFICATE OF SERVICE
Docket No. 991267-TP**

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

U.S. Mail this 8th day of February, 2000 to the following:

Beth Keating
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
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