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Legal Department

A. LANGLEY KITCHINGS  
General Attorney

00 MAR 27 PM 4:31

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0765

RECORDS AND  
REPORTING

March 27, 2000

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. 991854-TP

Dear Ms. Bayó:

Enclosed please find 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,

*A. Langley Kitchings*

A. Langley Kitchings

*(AK)*

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CIU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

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. 03798-00. 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. *(x-ref 02940-00)*

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03797 MAR 27 8

FPSC-RECORDS AND REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	)	
	)	
Petition for Arbitration of the Interconnection	)	
Agreement Between BellSouth Telecommunications,	)	Docket No. 991854-TP
Inc. and Intermedia Communications, Inc.	)	
Pursuant to Section 252(b) of the	)	Filed: March 27, 2000
Telecommunications Act of 1996.	)	
	)	

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**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 March 6, 1999, BellSouth filed its Rebuttal testimony in the above-captioned docket. 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 the rebuttal testimony. Attachment A also contains the specific justification for the request for confidential classification

DOCUMENT NUMBER-DATE  
03797 MAR 27 8  
FPSC-RECORDS/REPORTING

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. The information requested contains customer specific information. This information is treated as Proprietary and Confidential Business information by BellSouth. Both BellSouth and this Commission have always zealously protected customer specific information. This information, if made public, could allow a competitor of the customer to obtain an unfair advantage. Therefore, this information is clearly proprietary and confidential pursuant to Florida Statutes, Sections 364.24 and 364.183 and Rule 25-22.006, Florida Administrative Code.

6. 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.

7. 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 27th day of March, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*  
(305)

NANCY B. WHITE  
c/o Nancy Sims  
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*R Douglas Lackey*  
(404)

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202719

**CERTIFICATE OF SERVICE**  
**Docket No. 991854-TP**

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

(\*) Hand Delivery and (+) Federal Express this 27th day of March, 2000 to the following:

Timothy Vaccaro (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Carl Jackson (+)  
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Charles J. Pellegrini (\*) ##  
2145 Delta Boulevard  
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Tallahassee, FL 32302  
Tel. No. (850) 385-6007  
Fax. No. (850) 385-6008

  
A. Langley Kitchings

## Signed Protective Agreement

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 991854-TP,  
Exhibit AJV-2  
Rebuttal Testimony of Al Varner  
Request for Confidential Classification  
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3/27/00

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALPHONSO J. VARNER REBUTTAL TESTIMONY EXHIBIT AJV-2 FILED ON MARCH 6, 2000 IN DOCKET NO. 991854-TP

### Explanation of Proprietary Information

1. The information contained in Exhibit AJV-2 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 991854-TP,  
Exhibit AJV-2  
Rebuttal Testimony of Al Varner  
Request for Confidential Classification  
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3/27/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALPHONSO J.  
VARNER REBUTTAL TESTIMONY EXHIBIT AJV-2 FILED ON MARCH 6, 2000  
IN DOCKET NO. 991854-TP**

## LOCATION

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
1	Line Nos.1 through 13/ Column B	1
	Line 1through 13/ Column C	1