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Legal Department

MICHAEL P. GOGGIN
General Attorney

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

RECORDS AND
REPORTING

April 25, 2000

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

Re: 991854-TP (Intermedia Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's Second Request for Production (No. 4), which we ask that you file in the above-captioned 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
Michael P. Goggin

MPG/vf

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

This confidentiality request was filed by or for a "telco" for DN 05113-00. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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[Signature]
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05112 APR 25 8
FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket No. 991854-TP

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


U.S. Mail this 25th day of April, 2000 to the following:

Timothy Vaccaro
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6181

Carl Jackson
Senior Director
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Fax (813) 349-9802

Wiggins Law Firm
Charles J. Pellegrini (##)
2145 Delta Boulevard
Suite 200
Tallahassee, FL 32302
Tel. No. (850) 385-6007
Fax. No. (850) 385-6008


Michael P. Goggin

(##) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:) Docket No. 991854-TP
)
 Petition for Arbitration of the Interconnection)
 Agreement Between BellSouth Telecommunications,)
 Inc. and Intermedia Communications, Inc.)
 Pursuant to Section 252(b) of the)
 Telecommunications Act of 1996.)
) Dated: April 25, 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 this Request for Specified Confidential Classification, and states:

1. On March 15, 2000, the Staff of the Florida Public Service Commission ("Staff") served its Second Request for Production of Documents (No. 4) to BellSouth requesting a copy of all documents identified or referenced by BellSouth in response to Intermedia's First Set of Interrogatories. On March 27, 2000, BellSouth filed its General and Specific Objections to that discovery and on April 4, 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 Intermedia Communications, Inc.'s Request for Production No. 48 includes customer proprietary and business proprietary information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.

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 Intermedia Communications, Inc.'s Request for Production No. 48 includes customer proprietary 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.

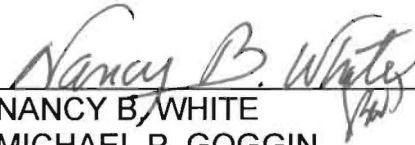
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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 25th day of April, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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MICHAEL P. GOGGIN

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R. DOUGLAS LACKEY

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 991854-TP
Request for Confidential Classification
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4/25/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS (INTERMEDIA'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, POD NO. 48) FILED APRIL 5, 2000 IN FLORIDA DOCKET NO.
991854-TP**

Explanation of Proprietary Information

1. The information requested concerns strategic planning information for Local Interconnection Call Transport and Termination which would bring harm to BellSouth if publicly released. This information is treated as Proprietary and Confidential Business information by BellSouth. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know BellSouth's strategic plans for trunking arrangements, architectures, planning implications, operations requirements, circuit provisioning and capacity management of local interconnection. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, marketing and overall business strategies. 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 is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 991854-TP
Request for Confidential Classification
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POD NO. 48

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