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Legal Department

MICHAEL P. GOGGIN
General Attorney

00 MAY -8 PM 4:30

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150 South Monroe Street
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Tallahassee, Florida 32301
(305) 347-5561

RECEIVED AND
REPORTING

May 8, 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 Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request For Specified Confidential Classification to Staff's 2nd Set of Interrogatories (Nos. 7-32) and First Request for Production of Documents (Nos. 1-2), which we ask that you file in the captioned dockets. Due to the Commission's action at the May 5, 2000 Agenda Conference, we understand that Staff no longer requires responses to Interrogatories Nos. 7-8, 20-23 and 26-32 and Request For Production No. 2. Accordingly, we have responded to only the remaining requests.

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

(28)

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 05 138-00. 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.

DOCUMENT NUMBER-DATE

05737 MAY -8 8

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE
Docket Nos. 990455-TL, 990456-TL, 990457-TL and (990517-TL)

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

(*) Facsimile and U.S. Mail this 8th day of May, 2000 to the following:

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Michael P. Goggin

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for review of proposed
numbering plan relief for the 305/786
area code
_____)

Docket No. 990455-TL

In re: Request for review of proposed
numbering plan relief for the 561 area
code
_____)

Docket No. 990456-TL

In re: Request for review of proposed
numbering plan relief for the 954 area
code
_____)

Docket No. 990457-TL

In re: Request for review of proposed
numbering plan relief for the 904 area
code
_____)

Docket No. 990517-TL

Filed: May 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 this Request for Specified Confidential Classification, and states:

1. On April 6, 2000, the Staff of the Florida Public Service Commission ("Staff") served its Second Set of Interrogatories and First Request for Production of Documents to BellSouth. On April 17, 2000, BellSouth filed its General and Specific Objections to that discovery and on May 8, 2000, BellSouth filed its Responses and Objections to that discovery.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's responses to Staff's Interrogatory No. 24 includes competitive business strategy and plans.

DOCUMENT NUMBER-DATE

05737 MAY-88

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Request for Production No. 1 includes competitive billing and collection cost data that could cause competitive harm to BellSouth. This information 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 Staff's Interrogatory No. 24 includes competitive business strategy and plans. Request for Production No. 1 includes competitive billing and collection cost data. 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.

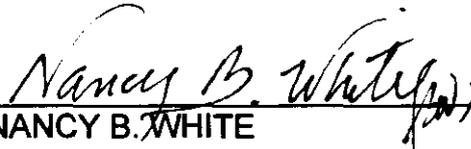
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

8. The original of this Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

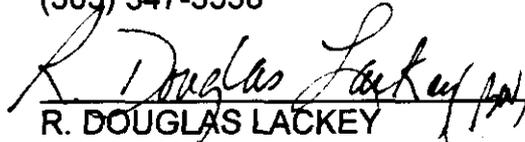
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 8th day of May, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

**BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket 990517-TL
Staff's 1st Request for Production to BellSouth
Dated: April 6, 2000
Item 1**

This confidential information contains competitive billing and collection cost data. The disclosure of this information to BellSouth's competitors is likely to give them an undue advantage and to cause competitive harm to BellSouth. This is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. BellSouth treats this information as confidential information and protects it from disclosure. Therefore, this information is both trade secret and proprietary confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

<u>DOCUMENT</u>	<u>PAGE NOs</u>	<u>COLUMNS LABELED</u>
POD Item 1, Attachment 1	1-3	MSG, MOU, OTMOU, REV, MONTHLY REV LOSS, MONTHLY ECS LOSS, MONTHLY OCP LOSS
POD Item 1, Attachment 2	1-18	MSG, MOU, REV, SRCH, MONTHLY TOLL LOSS, MONTHLY MTS LOSS, MONTHLY OCP LOSS, MONTHLY NEW ECS REV, MONTHLY REV IMP

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket 990517-TL
Staff's 2nd Interrogatories to BellSouth
Dated: April 6, 2000**

This confidential information contains competitive business strategy and plans. The disclosure of this information to BellSouth's competitors is likely to give them an undue advantage and to cause competitive harm to BellSouth. This is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. BellSouth treats this information as confidential information and protects it from disclosure. Therefore, this information is both trade secret and proprietary confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

<u>DOCUMENT</u>	<u>PAGE NOs</u>	<u>COLUMNS</u>
Interrogatory 24, Attachment A	1 - 2	System, Description,