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ORIGINAL

July 27, 2000

RECEIVED-FPSC  
00 JUL 27 PM 3:19  
RECORDS AND REPORTING

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

RE: Docket No. 990649-TP (UNEs)

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,

*Bennett L. Ross*

Bennett L. Ross

(initials) (x-ref. 08201-00)

Enclosures

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

This confidentiality request was filed by or for a "telco" for DN 09079-00. 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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*mev*

FPSC-BUREAU OF RECORDS

*Confidential*

*Redacted*

Request  
DOCUMENT NUMBER-DATE  
**09078** JUL 27 8  
FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

**09079** JUL 27 8

FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE

**09080** JUL 27 8

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 990649-TP**

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

U.S. Mail this 27th day of July, 2000 to the following:

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**(+) Signed Protective Agreement**

219337

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Investigation Into )  
Pricing Of Unbundled Network )  
Elements )  
\_\_\_\_\_ )

Docket No. 990649-TP

Filed: July 27, 2000

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

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

1. On July 6, 2000, BellSouth filed its Supplemental Responses to the Sixth Request for the Production of Documents filed in this docket by the Florida Public Service Commission Staff ("Staff"). Some of the information responsive to Production Request No. 27 is confidential and proprietary. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification.

2. BellSouth hereby files this Request for Confidential Classification because of the confidential and proprietary nature of some of the information contained in BellSouth's response to Staff's Request for Production No. 27. BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the specific locations of the confidential information in the responsive documents. Attachment A also contains the specific justification for the request for confidential classification

DOCUMENT NUMBER-DATE

09078 JUL 27 8

FPSC-RECORDS/REPORTING

3. BellSouth has appended to this Request as Attachment B two redacted paper copies 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. This information contains BellSouth's competitive marketing information. Public disclosure of this information would damage the competitive interests of BellSouth. The information discussed in this Request for Confidential Classification is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this 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 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 July, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Request for Confidential Classification  
Page 1 of 3  
7/27/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO STAFF'S SIXTH REQUEST FOR  
PRODUCTION OF DOCUMENTS (POD NO. 27) FILED JULY 6, 2000 IN  
FLORIDA DOCKET NO. 990649-TP**

### **Explanation of Proprietary Information**

1. This information contains competitive marketing information. This information if released would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Request for Confidential Classification  
Page 2 of 3  
7/27/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO STAFF'S SIXTH REQUEST FOR  
PRODUCTION OF DOCUMENTS (POD NO. 27) FILED JULY 6, 2000 IN  
FLORIDA DOCKET NO. 990649-TP**

**STAFF'S POD NO 27**

**BellSouth's Response to AT&T's 2<sup>nd</sup> Request for Production of Documents**

| <u>Document</u> | <u>Page/Location</u>                                      | <u>Reason</u> |
|-----------------|---|---------------|
| POD No. 37      | Page 1<br>a=, b=,<br>Columns FP Ratio,<br>%Fiber, %Copper | 1             |
|                 | Page 2<br>Lines 2-5<br>Columns B-J                        | 1             |
|                 | Page 3<br>Columns B-I                                     | 1             |
|                 | Page 4<br>Columns B-E                                     | 1             |
|                 | Page 5<br>Columns B-E<br>Note 1, Note 2                   | 1             |
|                 | Page 6<br>Line 1, Columns A-E<br>Note 1                   | 1             |

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Request for Confidential Classification  
Page 3 of 3  
7/27/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO STAFF'S SIXTH REQUEST FOR  
PRODUCTION OF DOCUMENTS (POD NO. 27) FILED JULY 6, 2000 IN  
FLORIDA DOCKET NO. 990649-TP**

**STAFF'S POD NO 27 (Cont.)**

| <u>Document</u>    | <u>Page/Location</u>  | <u>Reason</u> |
|--------------------|---|---------------|
| POD No. 37 (Cont.) |   |               |
|                    | Page 7<br>Line 6, Columns Dt, Dm<br>Dc, Q, R, S, T, U, IOF & Loop<br>Note 1, Note 2 | 1             |
|                    | Page 8<br>=c, =g, =s, =a, =b, =sr<br>Columns A-F                                    | 1             |
|                    | Page 9<br>Columns A-D, F<br>Lines 2-8, 10-24  | 1             |
|                    | Page 10<br>=c, =g, =s, =a, =b, =sr<br>Columns A-F<br>Lines 2-8, 10-21               | 1             |
|                    | Page 11<br>=c, =g, =s, =a, =b, =sr<br>Columns A-F<br>Lines 2-8, 10-23               | 1             |