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August 22, 2000

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RECORDS AND  
REPORTING

**BY HAND DELIVERY**

Ms. Blanca Bayó, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. 990649-TP

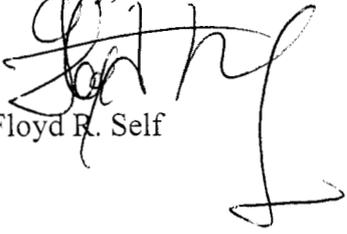
Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of AT&T Communications of the Southern States, Inc.'s Notice of Intent to Request Confidential Classification and 18 CD-ROMs which contain AT&T Communications of the Southern States, Inc.'s Responses to BellSouth's Second Request for Production of Documents in the above-referenced docket; these CD-ROMs are responsive to the Staff's Second Request for Production of Documents to AT&T, No. 3.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

  
Floyd R. Self

FRS/amb  
Enclosure

cc: Jim Lamoureux, Esq.  
Parties of Record

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 10319-00. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE

10318 AUG 22 8

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing ) Docket No. 990649-TP  
of unbundled network elements ) Filed: August 22, 2000  
\_\_\_\_\_ )

**NOTICE OF INTENT TO SEEK CONFIDENTIAL CLASSIFICATION**

AT&T Communications of the Southern States (“AT&T”), pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby file this Notice of Intent to Seek Confidential Classification for certain potentially confidential information of BellSouth Telecommunications, Inc. (“BellSouth”) that is included in AT&T’s responses to BellSouth’s Second Request for Production of Documents that is being provided to the Commission Staff pursuant to Staff’s Second Request of Production of Documents, No. 3, to AT&T. This production response consists of 18 CD-ROMs, 17 of which consist of a series of zipped files that constitute drafts of the revisions, changes, and other edits considered or made by the AT&T and WorldCom witnesses to the BellSouth Cost Calculator; the remaining CD-ROM consists of various Microsoft Excel spreadsheets that contain additional drafts of the revisions, changes, and other edits considered or made by the AT&T and WorldCom witnesses to the BellSouth Cost Calculator

The BellSouth Cost Calculator originally provided to AT&T and WorldCom was obtained from BellSouth pursuant to a protective agreement. Because BellSouth claims that certain portions of its Cost Calculator contain proprietary and confidential business information, AT&T and WorldCom have treated its revisions to the BellSouth Cost Calculator as confidential.

Because the material subject to this notice consists of 18 CD-ROMs, AT&T is unable to provide the Commission or the parties with redacted copies of printouts to these CD-ROMs, nor is

it possible at this time for AT&T to specifically identify the particular portions of the Excel spreadsheets or the zipped files that contain the claimed confidential information until BellSouth has had an opportunity to make such a determination.

AT&T has already provided BellSouth with a copy of these 18 CD-ROMs for its review. As appropriate, BellSouth will notify the Commission of which information it claims to be confidential and which information may already be subject to an order of this Commission regarding the confidentiality of such information.

This Notice is filed to preserve the confidentiality of this information pending the filing of any formal claim of confidentiality or a formal request for confidential classification by BellSouth. By filing this Notice, AT&T does not waive their right to contend that some or all of the information in fact may not be entitled to protected status.

RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of August, 2000.

Respectfully submitted,



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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket No. 990649-TP has been furnished by Hand Delivery (\*) and/or U. S. Mail to the following parties of record this 22nd day of August, 2000:

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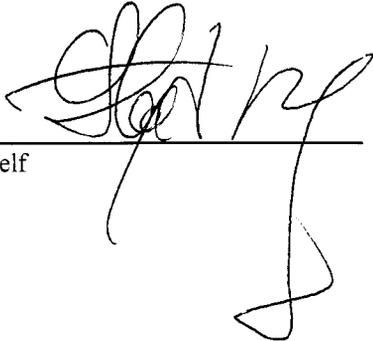
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