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00 SEP 11 PM 4:39

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RECORDS AND  
REPORTING

September 11, 2000

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

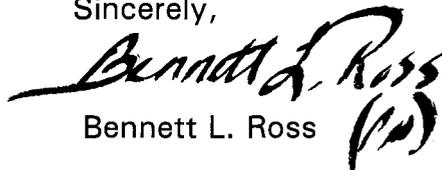
Re: Docket No. 990649-TP (UNE Docket)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification of portions of the Rebuttal Testimony of Joseph H. Page and Exhibit Nos. JHP-01 and JHP-03, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

  
Bennett L. Ross

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 11249-00. 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.

(x-ref. 10196-00)  
DOCUMENT NUMBER-DATE  
11246-00

11248 SEP 11 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  
Electronic Mail and Federal Express this 11th day of September, 2000 to the following:

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**(+) Signed Protective Agreement**

219337

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into )  
Pricing of Unbundled Network ) Docket No.: 990649-TP  
Elements )  
\_\_\_\_\_ ) Filed: September 11, 2000

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR 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 the following:

1. On August 21, 2000, BellSouth Telecommunications, Inc. filed the Rebuttal Testimony and Exhibits of Joseph H. Page, proposed revisions to which were filed on September 11, 2000. The testimony, along with Exhibits JHP-01 and JHP-03, include proprietary information. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification.

2. BellSouth hereby files this Request for Confidential Classification because the information contained in the portions of Mr. Page's Rebuttal Testimony and Exhibits JHP-01 and JHP-03 includes vendor-specific pricing information, confidential business information and customer proprietary information. Attachment "A" to BellSouth's Request for Confidential Classification contains the specific justification for the request for confidential classification along with a list that identifies the location of the information designated by BellSouth as confidential.

3. Attachment "B" to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.

4. 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.

5. The information contained in the portions of Mr. Page's Rebuttal Testimony and Exhibits JHP-01 and JHP-03 includes vendor-specific pricing information, confidential business information and customer proprietary information that is considered proprietary to BellSouth. 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. Therefore, such information should continue to be classified as confidential business information and customer proprietary 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.

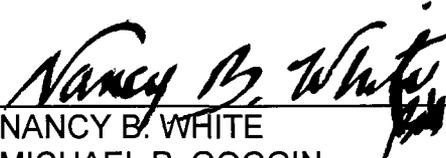
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

7. The original of this 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 11th day of September, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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228043

## ATTACHMENT A

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Request for Confidential Classification  
Page 1 of 2  
9/11/00**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE REBUTTAL TESTIMONY OF JOSEPH H. PAGE AND EXHIBITS JHP-1, FILED AUGUST 21, 2000 IN FLORIDA DOCKET NO. 990649-TP**

#### **Explanation of Proprietary Information**

1. This information reflects vendor specific pricing and/or information negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
2. This information contains competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information which was developed at an expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as research and development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.
3. This information is derived from the Switching Cost Information System (SCIS) which is the property of Telcordia Technologies, Inc (Telcordia). Public disclosure of this information would violate BellSouth's agreement with Telcordia and would impair BellSouth's ability to contract for goods and/or services in the future. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.

DOCUMENT NUMBER-DATE

11248 SEP 11 8

FPSC-RECORDS/REPORTING

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Request for Confidential Classification  
Page 2 of 2  
9/11/00

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE REBUTTAL TESTIMONY OF JOSEPH H. PAGE AND EXHIBITS JHP-1, FILED AUGUST 21, 2000 IN FLORIDA DOCKET NO. 990649-TP

### REBUTTAL TESTIMONY OF JOSEPH H. PAGE

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
5	Line 24	2
6	Lines 1-7, 24	2
7	Lines 5	2
10	Lines 11-14, 16,18-21	2
11	Lines 7,8,11,14,18,20,21,23,25	2
15	Lines 7-8	1
18	Lines 16-22	2

### JHP-1

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
Page 1 of 2	Entire Page	3
Page 2 of 2	Entire Page	3

### JHP-3

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
Page 1 of 1	Columns B-G, I	1