

RECEIVED-TPSC

Legal Department

BENNETT L. ROSS
General Attorney

00 SEP 15 PM 4:39

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0793

RECORDS AND
REPORTING

September 15, 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 its responses to Staff's Eighth Request for Production of Documents, Item Nos. 41, 42, 44, 47, 48, 52, 58 and 60 and Seventh Set of Interrogatories, Item No. 124, 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
Bennett L. Ross (BR)

This confidentiality request was filed by or for a "telco" for DN 11619-00. 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.

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

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

(X-ref. 10477-00)

DOCUMENT NUMBER-DATE

11618 SEP 15 8

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (#), Electronic Mail and Federal Express this 15th day of September, 2000 to the following:

Wayne D. Knight (#)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
Fax. No. (850) 413-6217
wknight@mail.psc.state.fl.us

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+) *
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. For FCCA
*Atty. for BlueStar
jmcglothlin@mac-law.com

Marsha Rule (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
Fax. No. (850) 425-6343
mrule@att.com

Jim Lamoureux (+)
AT&T Communications
1200 Peachtree Street, N.E.
Room 8068
Atlanta, Georgia 30309
Tel. No. (404) 810-4196
Fax. No. (404) 877-7648
jlamoureux@att.com

Richard D. Melson (+)
Gabriel E. Nieto
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI
Atty. for Rhythms Link
rmelson@hgss.com

Dulaney L. O'Roark
MCI Telecommunications Corporation
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488
De.OROark@mci.com

Floyd Self
Messer, Caparello & Self
Post Office Drawer 1876
215 South Monroe Street, Suite 701
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Atty. for AT&T
fself@lawfla.com

Terry Monroe
Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Jeremy Marcus (+)
Kristin Smith
Blumenfeld & Cohen
1625 Massachusetts Ave., Ste. 300
Washington, D.C. 20036
Tel. No. (202) 955-6300
Fax. No. (202) 955-6460
Represents Rhythms Links, Inc.
jeremy@technologylaw.com
kristin@technologylaw.com

Kimberly Caswell (+)
GTE Florida Incorporated
One Tampa City Center
201 North Franklin Street
Tampa, Florida 33602
Tel. No. (813) 483-2617
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Karen M. Camechis (+)
Pennington, Moore, Wilkinson &
Dunbar, P.A.
215 South Monroe Street, 2nd Flr.
Tallahassee, Florida 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek (+)
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Mark E. Buechele, Esquire
Supra Telecom
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
mbuechele@stis.com

Donna Canzano McNulty, Esq. (+)
MCI WorldCom, Inc.
325 John Knox Road
The Atrium Bldg., Suite 105
Tallahassee, FL 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Michael A. Gross (+)

VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
310 North Monroe Street
Tallahassee, FL 32301
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Florida Public Telecomm. Assoc.
Angela Green, General Counsel
125 South Gadsden Street
#200
Tallahassee, FL 32301-1525
Tel. No. (850) 222-5050
Fax. No. (850) 222-1355
abgreen@nettally.com

Intermedia Communications, Inc.
Scott Sapperstein (+)
Sr. Policy Counsel
3625 Queen Palm Drive
Tampa, FL 33619-1309
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
SASapperstein@intermedia.com

Charles J. Rehwinkel (+)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Counsel for Sprint
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Counsel for Sprint
jfons@ausley.com

Brian Sulmonetti

MCI WorldCom, Inc.
6 Concourse Parkway
Suite 3200
Atlanta, GA 30328
Tel. No. (770) 284-5500
Brian.Sulmonetti@wcom.com

Catherine F. Boone, Esq. (+)
Regional Counsel
Covad Communications Company
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495
Tel. No. (678) 579-8388
Fax. No. (678) 320-9433
cboone@covad.com

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491
beck.charles@leg.state.fl.us

Eric J. Branfman (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7500
Fax. No. (202) 424-7645
Represents Florida Digital Network, Inc.
ejbranfman@swidlaw.com

John McLaughlin

KMC Telecom. Inc.
Suite 170
3025 Breckinridge Boulevard
Duluth, GA 30096
Tel. No. (770) 931-5260
Fax. No. (770) 638-6796
jmclau@kmctelecom.com

Bettye Willis (+)
ALLTEL Communications
Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffrey Wahlen (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
Atty. for ALLTEL
jwahlen@ausley.com

Stephen P. Bowen
Blumenfeld & Cohen
4 Embarcadero Center
Suite 1170
San Francisco, CA 94111
Tel. No. (415) 394-7500
Fax. No. (415) 394-7505
stevebowen@earthlink.net

Norton Cutler (+)
General Counsel
BlueStar Networks, Inc.
5 Corporate Centre
801 Crescent Centre Drive
Suite 600
Franklin, Tennessee 37067
Tel. No. (615) 778-7316
norton.cutler@bluestar.com

Michael Bressman (+)

Associate General Counsel
5 Corporate Centre
801 Crescent Centre Drive
Suite 600
Franklin, Tennessee 37067
Tel. No. (615) 778-7350
Fax. No. (615) 788-7354
michael.bressman@bluestar.com

Charles J. Pellegrini
Wiggins & Villacorta, P.A.
2145 Delta Boulevard, Suite 200
Tallahassee, FL 32303
Represents Intermedia
cjpellegrini@nettally.com

George S. Ford (+)
Chief Economist
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
Tel. No. (813) 233-4630
Fax. No. (813) 233-4620
gford@z-tel.com

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036
Tel. No. (202) 955-9600
Fax. No. (202) 955-9792
jcanis@kelleydrye.com
mhazzard@kelleydrye.com
Counsel for Z-Tel Communications, Inc.

Rodney L. Joyce

Shook, Hardy & Bacon, LLP
600 14th Street, N.W., Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Russell M. Blau
Thomas R. Lotterman (+)
Michael Sloan (+)
Robert Ridings (+)
Swidler Berlin Shereff Friedman
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 424-7755
Fax. No. (202) 424-7643
Attys. for Broadslate Networks, Inc.
Attys. for Network Telephone
Attys. for Cleartel Comm.
MCSloan@swidlaw.com
rmbblau@swidlaw.com
rjridings@swidlaw.com
trlotterman@swidlaw.com

John Spilman
Director Regulatory Affairs and
Industry Relations
Broadslate Networks, Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911
Tel. No. (804) 220-7606
Fax. No. (804) 220-7701
john.spilman@broadslate.net

Gary Cohen (+)

Blumfeld & Cohen
1625 Massachusetts Ave., N.W.
Suite 320
Washington, D.C. 20036
Represents Rhythms Links, Inc.
gary@technologylaw.com

Hope G. Colantonio
Legal & Regulatory Manager
Cleartel Communications, Inc.
1255 22nd Street N.W., 6th Floor
Washington, D.C. 20037
Tel. No. (202) 715-1300
h.colantonio@cais.com

Brent E. McMahan
Vice President Regulatory and
Government Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
brentm@networktelephone.net


Bennett L. Ross

(+) 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 15, 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 Confidential Classification, and states the following:

1. On August 24, 2000, BellSouth Telecommunications, Inc. filed its responses to Staff's Eighth Request for Production of Documents and Seventh Set of Interrogatories. Request for Production Nos. 41, 42, 44, 47, 48, 52, 58 and 60 and Interrogatory No. 124 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 Request for Production Nos. 41, 42, 44, 47, 48, 52, 58 and 60 and Interrogatory No. 124 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.

DOCUMENT NUMBER-DATE

11618 SEP 15 8

FPSC-RECORDS/REPORTING

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 BellSouth's responses to Staff's Request for Production Nos. 41, 42, 44, 47, 48, 52, 58, and 60 and Interrogatory No. 124 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.

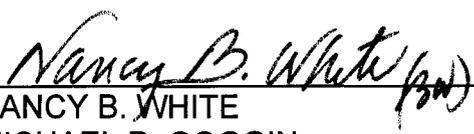
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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 15th day of September, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE
MICHAEL P. GOGGIN
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



BENNETT L. ROSS
E. EARL EDENFIELD JR.
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0793

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
9/15/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 7TH SET OF INTERROGATORIES (ITEM NO. 124)
AND 8TH REQUEST FOR PRODUCTION OF DOCUMENTS (41, 42, 44, 47, 48,
52, 58 AND 60), FILED AUGUST 24, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Explanation of Proprietary Information

1. This information reflects customer vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. 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.
2. The information requested concerns competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to intellectual property which was developed at significant expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as market research and market 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.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
9/15/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 7TH SET OF INTERROGATORIES (ITEM NO. 124)
AND 8TH REQUEST FOR PRODUCTION OF DOCUMENTS (41, 42, 44, 47, 48,
52, 58 AND 60), FILED AUGUST 24, 2000 IN FLORIDA DOCKET NO. 990649-
TP**

Staff's 7th Set of Interrogatories, Item No. 124

<u>Location</u>	<u>Line No.</u>	<u>Reason</u>
Response (r) Pg 8 of 8	1 and 2	1

POD No. 41

<u>Page No</u>	<u>Column/Line No.</u>	<u>Reason</u>
1	Material Cost Column	1
2	Lines 4-8, 10-12,14-17,18-20	1
4	All Prices	1
5	All Prices	1
6	Material Cost Column	1
7	2 nd Column	1
9	All Prices	1

97-106	Lucent Column	1
	Tellabs Column	1
	Alcatel Column	1
	3-1 Column	1
	DSC Column	1
	1-0 Column	1
107	Lucent Column	1
	Tellabs Column	1
	DSC Column	1
108	Lucent Column	1
	Tellabs Column	1
	Alcatel Column	1
109	Lines 9,11-18	1
110-111	Entire Page	1,2
112	Common Costs Column,	1
	DS3 Column, DS1 Col	
113-115	Entire Page	1,2
117	Material Price Col	1
118-123	Entire Page	1,2
128-133	Entire Page	1
134	2W FXS Line	1
	2W FXO Line	1
	4W FFXO Line	1
	4W FXS Line	1
	OCUDP Line	1
135	80 Circuits Line	1
	90 Circuits Line	1
	84 Circuits Line	1
	56 Circuits Line	1
	24 Circuits Line	1
	72 Fibers Line	1
	72 pre-term Line	1
	144 pre-term Line	1
	216 preterm Line	1
	7 Line	1
	9 Line	1
	11 Line	1
	7 Line	1
	Per Bay Column	1
	As Per Mike Hulsey Col	1
136	Primary Price Col	1
	Condar Upplier Col	1
	% Award Col	1
137	Primary Price Col	1
	Condar Upplier Col	1
138	Line 2 of message	1
139	Average Price Line	1
140	Starnd Ft Price Col	1
	Utilized Price Col	1

141	Price Per Fiber Mile Col	1
	80 Circuits Line	1
	90 Circuits Line	1
	84 Circuits Line	1
	56 Circuits Line	1
	24 Circuits Line	1
	72 Fibers Line	1
	72 pre-term Line	1
	144 pre-term Line	1
	216 preterm Line	1
	7 Line	1
	9 Line	1
	11 Line	1
	7 Line	1
	As Per Mike Hulsey Col	1

POD No. 48

<u>Page No.</u>	<u>Location</u>	<u>Reason</u>
Attachment 1		
2-4	Entire Page	1
5	Inv532C Col	1
	Inv630C Col	1
	Inv633C Col	1
	INV Col	1
	EXP Col	1
	RTU Col	1
	EXP + RTU Col	1
7	2000 Line	1
	2001 Line	1
	2002 Line	1
10	Acct 530C, Acct 630C, Expenses, Acct 460C Cols	1
Attachment 2		
5-117	Entire Page	1

POD No. 52

Entire Document	1
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POD No. 58

<u>Location</u>	<u>Reason</u>
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Lines 1994-2007 2

POD NO. 60

AT&T's 9th Set of Interrogatories

Item No. 192	Part A and B of request	1
Attachment	Entire Document	1

AT&T's 5th Request for Production of Documents

POD No. 62	Entire Document	2
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AT&T's 9th Request for Production of Documents

POD No. 69	Material Cost Col, EF&I Col	1
POD No. 71	Material Cost Col, EF&I Col	1

AT&T's 10th Request for Production of Documents

POD No. 73	page 2	Material Only Cost Col	1
		EF&I Col	1
	Page 3	DMS Col, 5ESS Col,	1
		Discount Col, Unit Col,	
		Utilized Inv Col	