

MICHAEL P. GOGGIN
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

ORIGINAL

RECORDS AND
REPORTING

03 SEP 21 PM 4:26

RECEIVED FPSC

September 21, 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 *Supplemental* Request for Specified Confidential Classification for our response to the Coalition's Request for Production No. 1, 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,

Michael P. Goggin
Michael P. Goggin

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

CAF
CWF
COM
CTR
ECR
LEG
OPC
PAI
RGO
SEC
SER
OTH

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~1-2018~~ SEP 21 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 21st 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
jmclglothlin@mac-law.com

Karen Jusevitch
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6313
Fax. No. (850) 425-6361
kjusevit@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@kmc telecom.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 Cleartel Comm.
MCSloan@swidlaw.com
rdblau@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


Michael P. Goggin

(+) Signed Protective Agreement

219337

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network element)

Docket No.: 990649-TP

Filed: September 21, 2000

BELLSOUTH TELECOMMUNICATIONS, INC.'S SUPPLEMENTAL REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, *Florida Administrative Code*, hereby files this *Supplemental Request for Specified Confidential Classification*, and states:

1. On August 31, 2000, BellSouth Telecommunications, Inc. filed its Response to The Coalition's First Request for Production of Documents (the "Response"), that includes proprietary information. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification.

2. BellSouth has filed Requests for Specified Confidential Classification ("RCCs") for all of the confidential and proprietary BellSouth information included in its Response. In particular, BellSouth filed the following RCC's with respect to this information:

- 07/18/00 Request for Specified Confidential Classification
- 07/26/00 Request for Specified Confidential Classification
- 07/27/00 Request for Specified Confidential Classification
- 09/15/00 Request for Specified Confidential Classification

Accordingly, the information identified in the Response identified as BellSouth's confidential and proprietary information remains confidential and exempt from Section 119.07(1), Florida Statutes.

3. In an abundance of caution, however, BellSouth hereby files this *Supplemental Request for Specified Confidential Classification* regarding the confidential information contained in the Response to The Coalition's First

DOCUMENT NUMBER-DATE

11918 SEP 21 8

FPSC-RECORDS/REPORTING

Request for Production of Documents, Item No. 1 which includes cost information, vendor-specific pricing information, and competitive business information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.

4. Attachment "A" to BellSouth's *Supplemental* Request for Specified 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.

5. Two copies of the documents with the confidential information redacted, normally included as Attachment "B", were provided with BellSouth's Requests for Confidential Classification filed July 18, 26, and 27 2000, and September 15, 2000.

6. The sealed envelope containing one copy of the documents including those portions that are confidential and proprietary, normally included as Attachment "C", was provided with BellSouth's Requests for Confidential Classification filed July 18, 26, and 27 2000, and September 15, 2000.

7. The information contained in BellSouth's response to the Coalition's First Request for Production of Documents, Item No. 1 includes cost information, vendor-specific pricing information, and competitive business information. 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 is valuable and BellSouth strives to keep it secret. 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.

8. 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.

9. 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 21st day of September, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE
MICHAEL P. GOGGIN

(PW)

c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY
BENNETT L. ROSS
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0747

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page
9/21/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO THE COALITION'S FIRST FOR PRODUCTION OF
DOCUMENTS (POD NO. 1) FILED AUGUST 31, 2000 IN FLORIDA DOCKET
NO. 990649-TP**

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 6
7/18/00

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

Explanation of Proprietary Information

1. The information requested concerns competitive business information and/or includes the average call volume per customer. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
2. This information reflects BellSouth's business strategies. BellSouth's competitors can use this information to develop their own business strategies. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
3. This subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it 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 6
7/18/00**

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

Explanation of Proprietary Information

4. 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).
5. This information reflects 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. The second category of vendor specific information constituting a trade secret is that which is proprietary to Telcordia. BellSouth is contractually bound by an agreement with Telcordia to treat it as such. 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.
6. This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 3 of 6
7/18/00

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

STAFF'S POD NO 27

BellSouth's Response to AT&T's 1st Set of Interrogatories

<u>Document</u>	<u>Location</u>	<u>Reason</u>
Interrogatory No. 36	RESPONSE	1
Interrogatory No. 44	Entire Document	2

BellSouth's Response to AT&T's 1st Request for Production of Documents

Please refer to the Request for Confidential Classification of BellSouth's Response to Staff's Fifth Request for Production of Documents (POD NO. 16) filed May 30, 2000 in Florida Docket No. 990649-TP.

BellSouth's Response to AT&T's 2nd Request for Production of Documents

<u>Document</u>	<u>Location</u>	<u>Reason</u>
POD No. 32	Page 2, Entire Page	3
POD No. 33	Page 5	6
	Lines 12, 13, 17 / Column C	
	Page 6	6
	Amount Column	

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 4 of 6
7/18/00

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

STAFF'S POD NO 27 (Cont.)

POD No. 37	Page 9 a=, b=, Columns FP Ratio, %Fiber, %Copper	4
	Page 10 Lines 2-5 Columns B-J	4
	Page 11 Columns B-I	4
	Page 12 Columns B-E	4
	Page 13 Columns B-E Note 1, Note 2	4
	Page 14 Line 1, Columns A-E Note 1	4

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 5 of 6
7/18/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 27) FILED JUNE 27, 2000 IN FLORIDA DOCKET NO. 990649-TP

STAFF'S POD NO 27 (Cont.)

POD No. 37 (Cont.)

Page 15 4
Line 6, Columns Dt, Dm
Dc, Q, R, S, T, U, IOF & Loop
Note 1, Note 2

Page 16 4
=c, =g, =s, =a, =b, =sr
Columns A-F

Page 17 4
Columns A-D, F
Lines 2-7, 9-25

Page 18 4
=c, =g, =s, =a, =b, =sr
Columns A-F
Lines 2-8, 10-22

Page 19 4
=c, =g, =s, =a, =b, =sr
Columns A-F
Lines 2-8, 10-28

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 6 of 6
7/18/00

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

STAFF'S POD NO 27 (Cont.)

BellSouth's Response to AT&T's 3rd Request for Production of Documents

<u>Document</u>	<u>Location</u>	<u>Reason</u>
POD No. 50	Entire Document	1

Rhythms Links' First Request for Production of Documents

<u>Document</u>	<u>Location</u>	<u>Reason</u>
POD No. 2	Entire Document	2
POD No. 3	Entire Document	5,6
POD No. 14	Entire Document	2
POD No. 17	Entire Document	2
POD No. 32	Entire Document	2

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
7/26/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 38) FILED JULY 5, 2000 IN FLORIDA DOCKET NO. 990649-TP

Explanation of Proprietary Information

1. This information reflects BellSouth's business strategies. BellSouth's competitors can use this information to develop their own business strategies. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
2. This information contains 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 exempt from the Open Records Act.
3. 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.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
7/26/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S SEVENTH REQUEST FOR PRODUCTION OF
DOCUMENTS (POD NO. 38) FILED JULY 5, 2000 IN FLORIDA DOCKET NO.
990649-TP**

STAFF'S POD NO. 38

AT&T's Fourth Request for Production of Documents

<u>Document</u>	<u>Page/Location</u>	<u>Reason</u>
POD No. 57	Pages 5-11, Entire Page	3
	Page 16, Lines 2-8	2

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 BELL SOUTH'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 2nd Request for Production of Documents

<u>Document</u>	<u>Page/Location</u>	<u>Reason</u>
POD No. 37	Page 1 a=, b=, Columns FP Ratio, %Fiber, %Copper	1
	Page 2 Lines 2-5 Columns B-J	1
	Page 3 Columns B-I	1
	Page 4 Columns B-E	1
	Page 5 Columns B-E Note 1, Note 2	1
	Page 6 Line 1, Columns A-E 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 Line 6, Columns Dt, Dm Dc, Q, R, S, T, U, IOF & Loop Note 1, Note 2	1
	Page 8 =c, =g, =s, =a, =b, =sr Columns A-F	1
	Page 9 Columns A-D, F Lines 2-8, 10-24	1
	Page 10 =c, =g, =s, =a, =b, =sr Columns A-F Lines 2-8, 10-21	1
	Page 11 =c, =g, =s, =a, =b, =sr Columns A-F Lines 2-8, 10-23	1

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 8TH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 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 BELLSOUTH'S RESPONSE TO STAFF'S 8TH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 60), FILED AUGUST 24, 2000 IN FLORIDA DOCKET NO. 990649-TP

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
------------	-----------------	---

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, Discount Col, Unit Col, Utilized Inv Col	1