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RECORDS AND
REPORTING

September 29, 2000

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

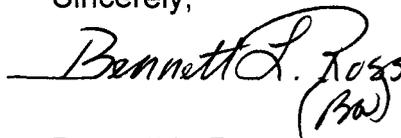
RE: Docket No. 990649-TP (UNEs)

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification of its response to Staff's Tenth Request for Production of Documents, Item No. 94. 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

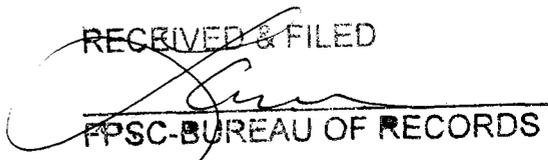
Enclosures

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

(x-ref. 11179-00)

This confidentiality request was filed by or for a "telco" for DN 12403-00. 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.

RECEIVED & FILED



FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12402 SEP 29 00

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 25th day of September, 2000 to the following:

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Bennett L. Ross (for)

(+) Signed Protective Agreement

219337

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Pricing of Unbundled Network)
Elements)
_____)

Docket No.: 990649-TP

Filed: September 29, 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 September 8, 2000, BellSouth Telecommunications, Inc. ("BellSouth") filed its responses to Staff's Tenth Request for Production of Documents. BellSouth's response to Request for Production No. 94 includes proprietary information. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of its response to Request for Production No. 94.

2. BellSouth hereby files this Request for Confidential Classification because the information contained in its response to Request for Production No. 94 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

12402 SEP 29 8

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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 response to Staff's Request for Production No. 94 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 29th day of September, 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 2
9/29/00**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO THE STAFF'S TENTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 94) FILED SEPTEMBER 8, 2000 IN FLORIDA DOCKET NO. 990649-TP

Explanation of Proprietary Information

1. 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.
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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
9/29/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO THE STAFF'S TENTH REQUEST FOR PRODUCTION OF
DOCUMENTS (POD NO. 94) FILED SEPTEMBER 8, 2000 IN FLORIDA
DOCKET NO. 990649-TP**

POD No. 94

<u>Location</u>	<u>Reason</u>
Entire Document	1 and 2