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October 26, 2000

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

Re: Docket No. 000649-TP - Request for Confidential Classification
CONFIDENTIAL MATERIALS ENCLOSED

Dear Ms. Bayó,

Enclosed for filing in the above-referenced docket, are an original and 15 copies of MCI metro Access Transmission Services, LLC and MCI WorldCom Communications, Inc.'s (collectively "WorldCom's") Request for Confidential Classification of Hearing Exhibit 16.

WorldCom requests that this information be returned to it after the Commission has no further need to retain it. If you have any questions regarding this filing, please contact me at your earliest convenience.

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

Enclosures

cc: Parties of record

This confidentiality request was filed by or for a "telco" for DN 13739-00. 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. 11112-00 & 12823-00)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCImetro Access) DOCKET NO. 000649-TP
Transmission Services LLC)
And MCI WorldCom) FILED: October 26, 2000
Communications, Inc. for arbitration)
of certain terms and conditions)
of a proposed agreement with)
BellSouth Telecommunications, Inc.)
concerning interconnection and resale)
under the Telecommunications Act of 1996.)

WORLDCOM'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

MCImetro Access Transmission Services LLC and MCI WorldCom Communications, Inc., (collectively "WorldCom") pursuant to Rule 25-22.006, Florida Administrative Code, hereby file this Request for Confidential Classification and state the following:

1. On September 7, 2000, WorldCom filed the rebuttal testimony of Don Price. Portions of that testimony included information that is proprietary to WorldCom, which have been identified as Hearing Exhibit 16. At the time of the filing of the rebuttal testimony, WorldCom filed a letter with the Division of Records and Reporting claiming the information to be confidential.

2. WorldCom hereby files this Request for Confidential Classification because the information contained in portions of Mr. Price's rebuttal testimony includes highly sensitive proprietary confidential business information. Attachment "A" to WorldCom's request contains the specific justification for the request for confidential classification along with a list that identifies the location of the information designated by WorldCom as confidential.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING 006597

3. Attachment "B" to WorldCom's request contains two copies of the documents with the confidential information redacted.

4. Attachment "C" to WorldCom's request is a sealed envelope containing one copy of the confidential documents, with the confidential material highlighted.

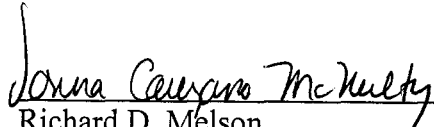
5. The information contained in portions of Mr. Price's rebuttal testimony relates to competitive interests, the disclosure of which would impair the competitive business of WorldCom. (Hearing Exhibit 16) Specifically, the information provides detailed information regarding WorldCom's deployment and capacity of certain telecommunications technology and equipment in specific areas in Florida, the number of its collocation arrangements, and the number of BellSouth wire centers in which the collocation arrangements have been established. This information is treated as proprietary and confidential business information by WorldCom. Public disclosure of this information would provide WorldCom's competitors and potential competitors with an advantage in knowing WorldCom's specific business strategies, and is valuable to such competitors in formulating strategies for entry, marketing, and overall business strategy. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

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

7. The original of this request has been filed with the Division of Records and Reporting.

WHEREFORE, based on the foregoing, WorldCom moves the Commission to enter an order declaring the information described above to be confidential information that is not subject to public disclosure.

Respectfully submitted this 26th day of October, 2000.


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Inc.

006599

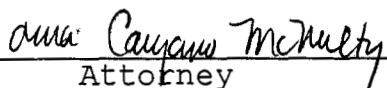
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail or Hand Delivery (*) this 26th day of October, 2000:

Patricia Christensen*
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Nancy B. White (*)
Michael P. Goggin
c/o Nancy Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Bennett L. Ross
BellSouth Telecommunications,
Inc.
675 W. Peachtree Street
Suite 4300
Atlanta, GA



Attorney

008600

ATTACHMENT "A"

DOCKET NO. 000649-TP
WORLD COM'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF PORTIONS OF PRICE'S REBUTTAL TESTIMONY

Explanation of Proprietary Information

The information contained in portions of Mr. Price's rebuttal testimony relates to competitive interests, the disclosure of which would impair the competitive business of WorldCom. (Hearing Exhibit 16) Specifically, the information provides detailed information regarding WorldCom's deployment and capacity of certain telecommunications technology and equipment in specific areas in Florida, the number of its collocation arrangements, and the number of BellSouth wire centers in which the collocation arrangements have been established. This information is treated as proprietary and confidential business information by WorldCom. Public disclosure of this information would provide WorldCom's competitors and potential competitors with an advantage in knowing WorldCom's specific business strategies, and is valuable to such competitors in formulating strategies for entry, marketing, and overall business strategy. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

Location: Price Rebuttal Testimony, Filed September 7, 2000

Page 47 Lines 3-7, 23

Page 48 Lines 1-3

C06601

ATTACHMENT "B"

2 Redacted Copies of Material for Public Record

006602

1 ****BEGIN PROPRIETARY****

2 The total equipped capacity of the WorldCom switches in the South
3 Florida area is in excess of [REDACTED] DSOs. WorldCom currently has customers
4 in eleven rates centers and provides those customers with more than [REDACTED] local
5 access circuits. Through the fiber network, these switches serve [REDACTED] on-
6 net buildings in [REDACTED] cities. [REDACTED] collocation arrangements have been established
7 in [REDACTED] BellSouth wire centers. These collocation arrangements are connected to
8 the appropriate switches via SONET transport systems that ride WorldCom's
9 fiber facilities, and additional SONET transport systems provide internodal
10 transport between and among the local nodes and the switch.

11 ****END PROPRIETARY****

12 **Q. PLEASE DESCRIBE WORLDCOM'S LOCAL NETWORK IN THE**
13 **ORLANDO AREA.**

14 A. The WorldCom network consists of one switches which is configured and
15 equipped to provide local service in fourteen rate centers. WorldCom currently
16 has customers in nine of these rate centers. Exhibit ____ (DP-2) provides the
17 Local Serving Area Map for the WorldCom local network. While WorldCom
18 uses one local switch and a transport network to serve these rate centers,
19 BellSouth utilizes 4 local or access tandems and a multitude of end offices to
20 serve this area.

21 ****BEGIN PROPRIETARY****

22 WorldCom's Orlando switch has a current equipped capacity of approximately
23 [REDACTED] DSOs, and current provides customers with more than [REDACTED] local

1 circuits. Through its fiber network, the Orlando switch serves [REDACTED] on-net
2 buildings in [REDACTED] cities. In addition, WorldCom has established [REDACTED] collocation
3 arrangements in [REDACTED] BellSouth and Sprint wire centers. As is the case in South
4 Florida, these collocation arrangements are connected to WorldCom's switch via
5 SONET transport systems that ride WorldCom's fiber facilities, and additional
6 SONET transport systems provide internodal transport between and among the
7 local nodes and the switch.

8 ****END PROPRIETARY****

9 **Q. PLEASE RESPOND TO MS. COX' ASSERTION (PAGE 87-89) THAT**
10 **WORLDCOM IS INAPPROPRIATELY SEEKING TO BASE**
11 **COMPENSATION FOR TRANSPORT BASED ON THE AVERAGE**
12 **DISTANCE BETWEEN BELLSOUTH'S END OFFICES SUBTENDING**
13 **A BELLSOUTH TANDEM SWITCH.**

14 A. Ms. Cox' position is completely inconsistent with the requirement that the
15 ILECs' costs are to be utilized as a proxy for the ALECs' costs. The FCC makes
16 this clear in Paragraph 1085 in the *Local Competition Order*. The FCC states:

17 We conclude that it is reasonable to adopt the incumbent LECs'
18 transport and termination prices as a presumptive proxy for other
19 telecommunications carriers' additional costs of transport and
20 termination.

21 One of the reasons that the FCC adopted this approach was its recognition that
22 ALECs' networks were not likely to be constructed in the same manner as the

ATTACHMENT "C"

Highlighted Copy of Confidential Material

STATE OF FLORIDA

Commissioners:
J. TERRY DEASON, CHAIRMAN
E. LEON JACOBS, JR.
LILA A. JABER
BRAULIO L. BAEZ



DIVISION OF RECORDS & REPORTING
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770

Public Service Commission

ACKNOWLEDGMENT

DATE: 10/26/00

TO: D. McNutt

FROM: R. Williams, Division of Records and Reporting

RE: Acknowledgment of Receipt of Confidential Filing

~~12030 00~~

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

D00649-TP or (if filed in an undocketed matter) concerning _____

Hearing Exh. No. 16, and

filed on behalf of NCF WorldCom. The

document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (8/00)