

MICHAEL P. GOGGIN
General Attorney

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

ORIGINAL

December 6, 2000

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

RECEIVED-TPSC
00 DEC - 6 PM 4: 12
RECORDS AND REPORTING

Re: Docket No. 000731-TP (AT&T Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Exhibit DDC-1 to the Direct Testimony of D. Daonne Caldwell (which was filed with the Commission in electronic form on November 15, 2000 and in paper copy form on December 1, 2000), 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
(2)

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

(see DN 14762-00
x-ref. 15388-00)

This confidentiality request was filed by or for a "telco" for DN 15663-00. 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

NW
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~XXXXXXXXXX~~
FPSC-RECORDS/REPORTING

1863

**CERTIFICATE OF SERVICE
Docket No. 000731-TP**


I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

U.S. Mail this 6th day of December, 2000 to the following:

Lee Fordham
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Marsha Rule
AT&T Communications of the Southern
States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6365
Fax. No. (850) 425-6361

Virginia Tate
AT&T Communications of the Southern
States, Inc.
1200 Peachtree Street, N.W.
Suite 8100
Atlanta, GA 30309
Tel. No. (404) 810-4922


Michael P. Goggin
(2)

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by AT&T Communications of the) Docket No. 000731-TP
 Southern States, Inc. and TCG South Florida)
 for arbitration of certain terms and conditions of a)
 proposed agreement with BellSouth)
 Telecommunications, Inc. pursuant to)
 47 U.S.C. § 252)
 _____) Filed: December 6, 2000

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On November 15, 2000, BellSouth filed its Direct Testimony of D. Daonne Caldwell. Attached to that testimony was Exhibit DDC-1, which was submitted on a CD Rom and contained cost studies that included vendor-specific pricing information and confidential business information which is considered proprietary to BellSouth. On November 15, 2000, along with the testimony and Exhibit DDC-1, BellSouth filed its Notice of Intent to Request Specified Confidential Classification. On December 1, 2000, pursuant to the Staff of the Florida Public Service Commission ("Staff's") request, BellSouth filed paper copies of the same information contained on the CD Rom which was filed on November 15, 2000. On December 1, 2000, along with the paper copies of Exhibit DDC-1 BellSouth filed another Notice of Intent to Request Specified Confidential Classification.

2. The information contained in each version of Exhibit DDC-1 to D. Daonne Caldwell's Direct Testimony includes vendor-specific pricing information and confidential business information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Section 364.183.

3. Attachment A to BellSouth's Request for 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.

4. Attachment B to BellSouth's Request for Confidential Classification contains two paper copies of Exhibit DDC-1 with the confidential information redacted.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of Exhibit DDC-1 including those portions that are confidential and proprietary.

6. The information contained in Exhibit DDC-1 to D. Daonne Caldwell's Direct Testimony includes, among other things, vendor-specific pricing information and confidential 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 discussed in this Request for Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to

Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

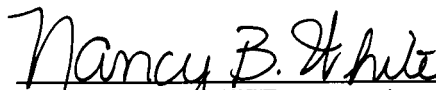
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

8. 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 6th day of December, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (22)

MICHAEL P. GOGGIN

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY (22)

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

238524

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 1 of 6
12/06/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP**

Explanation of Proprietary Information

1. This information reflects vendor specific pricing 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.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 2 of 6
12/06/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP

COMPACT DISK

PROPRIETARY COST STUDY FILING CD

File Name	<u>BASIS</u>
Ds1_calc.xls	1
MDF_FUND.xls	1
F1phycol.xls	1
FLPCpot.xls	1
F1pckey.xls	1
F1vcoll.xls	1
FLAsmbPt.xls	1
F1adjphc.xls	1
FLCollRT.xls	1
FLVCRT.xls	1
FLLineSh.xls	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 3 of 6
12/06/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP**

PAPER COPY

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
595	L	41 thru 51	1
597	L	133 thru 136	1
598	F	18,19,34,36,39, 41 46,48,51,53,58,59, 61 and 63	1
599	F	68,69,71,73,88,90 92,94,96,98,103,105 107,109,111,113, 118 and 119	1
600	F	128, 129,145,147, 151,153,155,157,	1
600	F	159	1
601	C	10 thru 20	1
604	E	11 and 13	1
607	E	11,15,23 and 27	1
608	E	11,15,23 and 27	1
609	E	11,13,19 and 23	1
610	E	11,13,19 and 23	1
611	E	11,15, 21,25,31 and 35	1
613	E	11,15,21,25,31 and 35	1
615	E	19 and 21	1
616	E	12,14,24,26,28,30 and 32	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 4 of 6
12/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP**

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
617	E	11 and 13	1
618	E	11,13,15 and 17	1
620	E	13 and 17	1
621	E	13,17,23,29 and 35	1
628	E	12,14,16,18,24,26, 28,30,36,38,40, 42,44,46,52,54,56,58, 60 and 62	1 1
629	E	67,68,74,75,79,80,84, 85,88,89,97,98,104, 105,109,110,114, 115,118 and 119	1
630	E	10,11,15 and 16	1
631	E	10,11,15 and 16	1
632	E	10,11,15,16,20 and 21	1
633	E	10,11,15,16,20 and 21	1
634	E	10,11,21,22,29,30,37, 38,43 and 44	1
635	E	10,11,21,22,29,30,37, 38,43 and 44	1
642	L	11 thru 14	1
643	E	10,12,14, and 16	1
644	E	10,12,14, and 16	1
652	G	26,28,33,34,35,38,41, 45,46,47,50,53,57, 58,60 and 63	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 5 of 6
12/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP**

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
653	G	67,68,70,73,77,78,81, 82,85,86,93,94,97,98, 101 and 102	1
654	N	27 thru 37	1
657	C	11 thru 21	1
660	C	8 and 10	1
661	C	10,12,22 and 26	1
663	C	10,12,22 and 26	1
664	C	10,12,18 and 22	1
665	C	10,12,18 and 22	1
666	C	10,12,20,22,30 and 32	1
667	C	10,12,20,22,30 and 32	1
674	G	12,13,17,18,22,23,27,28, 34,35,39,40,44,45,49 and 50	1
675	G	56,57,61,62,66,67,71, 72,75,76,79 and 80	1
677	C	9,10,17,18,25,26, 33 and 34	1
679	C	9,10,17,18,25,26,33 and 34	1
680	C	9,10,17,18,25,26,33,34, 39,40,48 and 49	1
688	G	19,21,24,26,31,33, 36,38,43,44,46,48,53, 54,56,58,63,65,67,69, 71,73,78,80,82 and 84	1
689	G	86 and 88	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 000731-TP
Request for Confidential Classification
Page 6 of 6
12/06/00

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT DDC-1 OF D.
DAONNE CALDWELL'S DIRECT TESTIMONY (CD ROM VERSION) FILED
NOVEMBER 15, 2000 AND (PAPER VERSION) FILED DECEMBER 1, 2000 IN
FLORIDA DOCKET NO. 000731-TP**

<u>PAGE NO.</u>	<u>COLUMN</u>	<u>LINE</u>	<u>BASIS</u>
692	D	10,14,22 and 26	1
694	D	10,14,22 and 26	1
695	D	10,12,18 and 22	1
696	D	10,12,18 AND 22	1
697	D	10,14,20,24,30 and 34	1
698	D	10,14,20,24,30 and 34	1
705	L	11 thru 14	1
706	F	14,15,21,22,28 and 29	1
707	E	9,11,26,28,43 and 45	1
708	E	10,12,14 and 16	1
724	F	14,15,21,22,28 and 29	1
725	E	9,11,26,28,43 and 45	1
733	F	13,14,18,19,23,24,28, 29,35,36,37,40,41,45, 46,50 and 51	1
734	F	57,58,60,61,63,64, 66 and 67	1
735	E	10,12,22,24,36,38, 48 and 50	1
736	E	10,12,22,24,36,38, 48 and 50	1