JAMES MEZA III Attorney

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

May 14, 2001

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. 001797-TP (Covad Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Exhibit WBS-1 to the Direct Testimony of William Bernard Shell, 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,

James Meza III

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

CERTIFICATE OF SERVICE Docket No. 001797-TP

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

Federal Express this 14th day of May, 2001 to the following:

Felicia Banks
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
fbanks@psc.state.fl.us

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

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, P.A.
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Atty. for Covad
Jmcglothlin@mac-law.com
vkaufman@mac-law.com

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Interconnection Arbitration)	Docket No. 001797-TF
By DIECA Communications, Inc. d/b/a)	
Covad Communications Company Against)	
BellSouth Telecommunications, Inc.)	
)	Filed: May 14, 2001

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

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

- 1. On April 23, 2001, BellSouth Telecommunications, Inc. filed its direct testimony of William Bernard Shell. Attached to that testimony was Exhibit WBS-1 which contained vendor-specific, cost information and confidential business information that is considered confidential and proprietary to BellSouth. On that same day, BellSouth also filed its Notice of Intent to Request Confidential Classification for Exhibit WBS-1.
- 2. BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in this exhibit is confidential and proprietary to BellSouth as it includes information containing, among other things, vendor-specific, cost information and confidential business information. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary confidential business information.

- 3. Exhibit WBS-1 contains information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, vendor specific information, cost information and confidential business information. A more specific description of this information is contained in Attachment A. This information is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Sections 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.
- 4. 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.
- 5. Appended hereto as Attachment B is two copies of the requested documents with the confidential information deleted.
- 6. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

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

Respectfully submitted this 14th day of May, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE JAMES MEZA III

c/o Nancy Sims

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(305) 347-5558

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(404) 335-0747

344010

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 1 of 4 5/14/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS EXHIBIT WBS-1 TO THE DIRECT TESTIMONY W. BERNARD SHELL ON APRIL 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

Explanation of Proprietary Information

The subject information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would harm BellSouth's business operations because it 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 Section 119.07(1) and Section 24(a), Art.1 of the State Constitution.

COMPACT DISK

1.

PROPRIETARY COST STUDY FILING CD

FILE NAME	REASON
MDF_FUND.xls	1
Flphycol.xls	1
FLPCpot.xls	1
Flpckey.xls	1
FicoliRT.xls	1
FLLineSH.xls	1
Fladjhc.xls	1

PAPER COPY

PAGE NO.	Column	LINE	REASON
423	L	41 thru 51	1
425	L	133 thru 136	1
426	F	18,19,34,36,39,41	1
		46,48,51,53,58,59,	
		61 AND 63	
427	F	68,69,71,73,88,90	1
		92,94,96,98,103,105	
		107,109,111,113,	
		118 and119	
428	F	128, 129	1

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 2 of 4 5/14/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS EXHIBIT WBS-1 TO THE DIRECT TESTIMONY W. BERNARD SHELL ON APRIL 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

PAGE NO.	<u>Column</u>	<u>LINE</u>	REASON
429	C	10 thru 20	1
431	E	11 and13	1
434	Ε	11,15,23 and 27	1
435	Ε	11,15,23 and 27	1
436	Ε	11,13,19 and 23	1
437	E	11,13,19 and 23	1
438	E	11,15,21,25,31 and 35	1
440	Е	11,15,21,25,31 and 35	1
441	E	19 and 21	1
442	E	12,14,24,26,28,30	
		and 32	
443	Ε	11 and 13	1
444	E	11,13,15 and 17	1
452	Ε	12,14,16,18,24,26,	
		28,30,36,38,40,	
		42,44,46,52,54,56,58,	
		60 and 62	
453	E	67,68,74,75,79,80,84,	1
		85,88,89,97,98,104,	
		105,109,110,114,	
		115,118 and 119	
454	E	10,11,15 and 16	1
455	Ε	10,11,15 and 16	1
456	E	10,11,15,16,20 and 21	1
457	Ε	10,11,15,16,20 and 21	1

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 3 of 4 5/14/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS EXHIBIT WBS-1 TO THE DIRECT TESTIMONY W. BERNARD SHELL ON APRIL 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

PAGE NO.	<u>Column</u>	LINE	REASON
458	E	10,11,21,22,29,30,37,	1
		34,43 and 44	
459	E	10,11,21,22,29,30,37,	1
		38,43 and 44	
466	L	11 thru 14	1
467	E	10,12,14 and 16	1
468	E	10,12,14, and 16	1
476	G	19,21,24,26,31,33,	1
		36,38,43,44,46,48,53,	
		54,56,58,63,65,67,69,	
		71,73,78,80,82 and 84	
477	G	86 and 88	1
480	D	10,14,22 and 26	1
482	D	10,14,22 and 26	1
483	D	10,12,18 and 22	1
484	D	10,12,18 and 22	1
485	D	10,14,20,24,30 and 34	1
486	D	10,14,20,24,30 and 34	1
493	L	11 thru 14	1
494	F	14,15,21,22,28, and 29	1
495	Ε	9,11,26,28,43 and 45	1
496	E	10,12,14 and 16	1
512	F	13,14,18,19,23,24,28,	1
		29,35,36,37,40,41,45,	
		46,50 and 51	

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 001797-TP Request for Confidential Classification Page 4 of 4 5/14/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS EXHIBIT WBS-1 TO THE DIRECT TESTIMONY W. BERNARD SHELL ON APRIL 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

PAGE NO.	<u>Column</u>	LINE	REASON
513	E	10,12,22,24,36,38,	1
		48 and 50	
514	Е	10,12,22,24,36,38	1
		48 and 50	