

JAMES MEZA III
Attorney

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

June 13, 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 responses to Covad's Second Request for Production Nos. 34, 35, 36 and 37, 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 (KM)

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

DOCUMENT NUMBER-DATE

07397 JUN 13 01

FPSC-RECORDS/REPORTING

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 13th day of June, 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
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Atlanta, GA 30328-3495
Tel. No. (678) 222--3469
Fax. No. (240) 525-5673
cboone@covad.com
Atty. for Covad

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman (+)
McWhirter Reeves McGlothlin Davidson
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Jmcglothlin@mac-law.com
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James Meza III (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Interconnection Arbitration) Docket No. 001797-TP
By DIECA Communications, Inc. d/b/a)
Covad Communications Company Against)
BellSouth Telecommunications, Inc.)
_____) Filed: June 13, 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 May 8, 2001, Covad Communications Company ("Covad") served its Second Set of Interrogatories and First Request for Production on BellSouth. On May 18, 2001, BellSouth filed its Objections to that discovery and on May 23, 2001, BellSouth served its Responses and Objections to that discovery along with a Notice of Intent to Request Confidential Classification.
2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in some of the Responses to Covad's Second Request for Production, specifically Nos. 34, 35, 36 and 37 include, among other things, vendor-specific pricing information and confidential business information. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential business information. A more specific description of this information

is contained in Attachment A. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

3. 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.

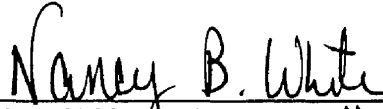
4. Appended hereto as Attachment B is two copies of the requested documents with the confidential information deleted.

5. 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 13th day of June, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (EA)

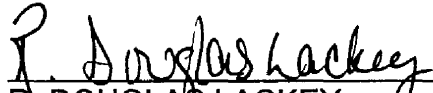
JAMES MEZA III

c/o Nancy Sims

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R. DOUGLAS LACKEY (EA)

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392777

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 001797-TP
Request for Confidential Classification
Page 1 of 2
6/13/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO COVAD'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD NOS. 34, 35, 36 and 37) FILED May 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

Explanation of Proprietary Information

1. This information reflects vendor specific information/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.
2. The information requested contains practices/procedures utilized by BellSouth to conduct business. This information, if released, would allow BellSouth's competitors to have free access to certain intellectual property which was developed at significant expense to BellSouth. BellSouth's competitors can use this information to develop their own strategies without the burden and expense of developing this property for themselves. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and the information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes. In addition, this information, which BellSouth keeps as trade secrets, is valuable because it is used by BellSouth in conducting its business. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 001797-TP
Request for Confidential Classification
Page 2 of 2
6/13/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO COVAD'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (POD
NOS. 34, 35, 36 and 37) FILED May 23, 2001 IN FLORIDA DOCKET NO. 001797-TP**

POD No.34

<u>Page No.</u>	<u>Line No/Column</u>	<u>Reason</u>
Pg 1 of 1	Line Nos. 13,14,18,19,23,24 28-31,35,36,40,41,45,46,50-54	1

POD No. 35

<u>Page No.</u>	<u>Line No/Column</u>	<u>Reason</u>
Entire Document		2

POD No. 36

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
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POD No. 37

<u>Page No.</u>	<u>Line No./Column</u>	<u>Reason</u>
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