

JAMES MEZA III  
Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
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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 exhibits to Covad Communications Company's Rebuttal Testimony of Joseph P. Riolo and Panel Testimony of Joseph P. Riolo and Beth R. Y. Kientzle which contain information confidential to BellSouth. We ask that you file this request 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 (KA)

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

DOCUMENT NUMBER-DATE  
07403 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 (+)  
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Suite 650  
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cboone@covad.com  
Atty. for Covad

Joseph A. McGlothlin (+)  
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\_\_\_\_\_  
James Meza III (EM)

**(+) 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 23, 2001, Covad Communications Company ("Covad") filed its Rebuttal Testimony of Joseph P. Riolo and the Panel Testimony of Joseph P. Riolo and Beth R. Y. Kientzle. Included in that testimony was information that BellSouth considered to be confidential and proprietary. On that same day, Covad filed a Notice of Intent to Request Specified Confidential Classification for this information. BellSouth has also previously filed a Notice of Intent to Request Specified Confidential Classification and a Request for Specified Confidential Classification for this same information.

2. In an abundance of caution, 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 Covad's Rebuttal Testimony of Joseph P. Riolo and the Panel Testimony of Joseph P. Riolo and Beth R. Y. Kientzle is confidential and proprietary to BellSouth. Some of this testimony

includes, 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*

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NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

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*R. Douglas Lackey*

\_\_\_\_\_  
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# ATTACHMENT A

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

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF COVAD'S REBUTTAL TESTIMONY OF BETH R. Y. KIENTZLE AND JOSEPH P. RIOLO (AS A PANEL) AND THE REBUTTAL TESTIMONY OF JOSEPH P. RIOLO. FILED ON MAY 23, 2001 IN FLORIDA DOCKET NO. 001797-TP

### Explanation of Proprietary Information

1. 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.

### KIENTZLE/RIOLO REBUTTAL TESTIMONY

<u>PAGE NO</u>	<u>LINE</u>	<u>REASON</u>
9	12-13	1
10	6, 13-14, 18	1
11	10, 20	1
12	1-4, 6, 9, 19-22	1
13	14-15, 19	1
14	2, 12-14	1
17	6-7, 9	1
19	6	1
22	13-21	1
23	1	1
35	4-14	1

### RIOLO REBUTTAL TESTIMONY

<u>PAGE NO</u>	<u>LINE</u>	<u>REASON</u>
7	18-19, 22	1
8	4, 6, 8	1
9	10-11	1