

**NANCY B. WHITE**  
General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

June 28, 2001

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

**Re: 991378-TL (Show Cause Docket)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Amended Request for Specified Confidential Classification of Exhibit No. REP-15 to R. Earl Poucher's Direct Testimony which we ask that you file in the above-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,

*Nancy B. White*  
Nancy B. White (UA)

cc: All parties of record  
Marshall M. Criser III  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

08043 JUN 28 01

FPSC RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 991378-TL**

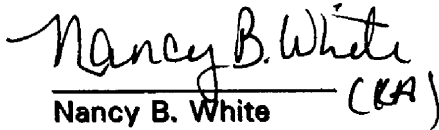
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(\*) Hand Delivery or U. S. Mail this 28th day of June, 2001 to the following:

Walter D'Haeseleer, Director (\*)  
Division of Communications  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Wayne Knight, Staff Counsel (\*)  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Charles J. Beck  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Attorney for the Citizens  
of the State of Florida

  
Nancy B. White (CRA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of show cause )  
proceedings against BellSouth ) DOCKET NO. 991378-TL  
Telecommunications, Inc., for )  
violation of service standards. )  
\_\_\_\_\_ ) FILED: June 28, 2001

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

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its Amended Request for Specified Confidential Classification, and states:

1. On December 8, 2000, the Office of Public Counsel ("Public Counsel") filed Direct Testimony R. Earl Poucher. On December 11, 2000, BellSouth filed a request that Mr. Poucher's Testimony be treated under a claim for confidential treatment pursuant to Rule 25-22.006.

2. On February 15, 2001, BellSouth filed Direct and Rebuttal Testimony of Joseph P. Lacher along with a request that Mr. Lacher's testimony be treated under a claim for confidential treatment pursuant to Rule 25-22.006.

3. On March 22, 2001, Public Counsel filed Confidential Surrebuttal Testimony of R. Earl Poucher pursuant to Rule 25-22.006.

4. On June 21, 2001 BellSouth filed a Request for Specified Confidential Classification for Exhibit Nos. REP-6, REP-18, REP-19, REP-20, REP-21, REP-25, REP-26, REP-27, REP-29, REP-39, REP-40 and REP-42 to R. Earl Poucher's Direct and Surrebuttal Testimony. Exhibit No. REP-15 was

Included in the attachments to the Request for Specified Confidential Classification, however, the exhibit was not identified in the pleading nor was it listed on Attachment A of the Request.

5. BellSouth hereby files this Amended Request for Specified Confidential Classification because the information in Exhibit No. REP-15 to R. Earl Poucher's Direct Testimony contains confidential business information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Sections 364.183.

6. Attachment A to BellSouth's Amended 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.

7. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.

8. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents including those portions that are confidential and proprietary.

9. The information contained in Mr. Poucher's Direct Testimony Exhibit contains 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 Amended Request for Confidential

Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary information pursuant to Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

10. 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.

11. The original of this Amended Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

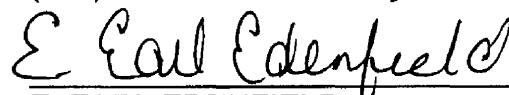
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 28th day of June, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



\_\_\_\_\_  
NANCY B. WHITE (CA)  
c/o Nancy Sims  
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Tallahassee, FL 32301  
(305) 347-5558



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E. EARL EDENFIELD (CA)  
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Atlanta, GA 30375  
(404) 335-0763

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 991378-TL  
Request for Confidential Classification  
Page 1  
6/28/01

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS CONTAINING BELLSOUTH'S INFORMATION FILED AS EXHIBITS TO THE DIRECT AND SURREBUTTAL TESTIMONY OF R. EARL POUCHER ON DECEMBER 8, 2000 IN FLORIDA DOCKET NO. 991378-TL

#### Explanation of Proprietary Information

1. The subject information concerns includes BellSouth's business plans, forecasts, practices and procedures developed by BellSouth, and other confidential business information. Public disclosure of this information would harm BellSouth's business operations because it would damage the competitive interests of BellSouth. 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.
2. This information reflects BellSouth's marketing strategy relating to it's competitive marketing position. Specifically, this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability compete and is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.

#### PAGE NO.

Exhibit REP-15, Entire Document

#### BASIS

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