

JAMES MEZA III  
Attorney

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

July 10, 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 its response to Staff's First Request for Production of Documents No. 6, 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 (KA)

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

DOCUMENT NUMBER-DATE

08422 JUL 10 01

FPCO-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 10th day of July, 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  
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cboone@covad.com  
Atty. for Covad

Joseph A. McGlothlin (+)  
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vkaufman@mac-law.com

  
James Meza III (RM)

**(+) 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: July 10, 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 June 4, 2001, the Staff of the Florida Public Service Commission served BellSouth Telecommunications, Inc. with its Second Set of Interrogatories and First Request for Production of Documents. On June 19, 2001, BellSouth filed its responses to that discovery along with a Notice of Intent to Request Confidential Classification. BellSouth's response to Staff's First Request for Production No. 6 contains vendor information that is considered confidential and proprietary to BellSouth.

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 BellSouth's response to Staff's First Request for Production No. 6 contains, among other things, vendor specific and pricing information that is considered confidential and proprietary to BellSouth. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to

DOCUMENT NUMBER-DATE

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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 10th day of July, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

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*R. Douglas Lackey*

R. DOUGLAS LACKEY (KA)

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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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7/10/01**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 6) FILED JUNE 19, 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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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7/10/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 6)  
FILED JUNE 19, 2001 IN FLORIDA DOCKET NO. 001797-TP**

**POD No. 6**

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