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September 19, 2001

Mrs. Blanca S. Bayo
Director, Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**RE: Docket NO. 001305-TP (Joint Request for Specified
Confidential Classification)**

Dear Ms. Bayo:

Enclosed please find the original and ten copies of the parties Joint Request for Specified Confidential Classification. This does not include Attachment A, as it is being submitted in a sealed envelope due to its confidentiality.

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 show on the attached Certificate of Service.

Sincerely,

Brian Chaiken
General Counsel

c: All Parties of Record

DOCUMENT NUMBER: 001305-TP
11705 SEP 19 2001
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of the Interconnection)
Agreement Between BellSouth Telecommunications,) Docket No. 001305-TP
Inc. and Supra Telecommunications & Information)
System, Inc., Pursuant to Section 252(b) of the) Filed: September 19, 2001
Telecommunications Act of 1996.)
_____)

JOINT REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth") and Supra Telecommunications and Information Systems, Inc. ("Supra"), hereby file, pursuant to Rule 25-22.006, Florida Administrative Code, their Request For Confidential Classification, and state the following:

1. On July 27, 2001 Supra filed the direct testimony of Mr. Ramos, Mr. Nilson, and Ms. Bentley, and exhibits thereto. On August 15, 2001, Supra filed the rebuttal testimony of Mr. Ramos, Mr. Nilson, Ms. Bentley, and Mr. Zejinilovic, and exhibits thereto. With each of these filings, Supra filed a Notice of Intent to Request Confidential Classification because certain of the testimony and certain of the exhibits contain confidential information.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth and Supra are now filing a Request for Confidential Classification for portions of the pre-filed testimony of Mr. Ramos, Mr. Nilson, and Ms. Bentley, as well as Exhibits OAR-3, OAR-4, OAR-5, OAR-6, OAR-7, OAR-47, OAR-51, OAR-54, OAR-62, OAR-72, OAR-79, OAR-80, OAR-104, DAN-3, and CB-1 because that testimony and those exhibits contain substantive references to a commercial arbitration award

dated June 5, 2001 ("Award") and other documents related to the commercial arbitration proceeding. Although it is Supra's position that the Award itself is not confidential as it is being utilized to protect Supra's legal rights, for the sole and exclusive purpose of this proceeding and in order to comply with the July 20, 2001 Order Regarding Supra's and BellSouth's Motions For Interpretation Of The June 5, 2001 Award in Consolidated Arbitrations issued by the Dispute Resolution Arbitral Tribunal, Supra and BellSouth have agreed to classify the Award as well as the testimony and exhibits listed above and set forth in Attachment A appended hereto, as containing confidential proprietary business information in accordance with Section 364.183 of the Florida Statutes. Accordingly, such information should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

3. Pursuant to Rule 25-22.06(3)(a), BellSouth and Supra are also now filing a Request for Confidential Classification for portions of the pre-filed testimony of Mr. Ramos, Mr. Nilson, Ms. Bentley, and Mr. Zejinilovic, as well as Exhibits OAR-61, OAR-63, OAR-81, OAR-82, OAR-83, OAR-84, OAR-85, OAR-86, OAR-87A, OAR-87B, OAR-88, OAR-89A, OAR-89B, OAR-90, OAR-102, OAR-103, DAN-2, DAN-4, CB-2, AZ-2, AZ-3, AZ-4, AZ-5, AZ-6, and AZ-7 because that testimony and those exhibits contain confidential business information, customer specific information and competitive business information that is considered confidential and proprietary to BellSouth. 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 (which is filed in a sealed envelope). Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

4. BellSouth and Supra have treated and intend to continue to treat the information for which confidential classification is sought as private in connection with the instant proceeding, 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.

WHEREFORE, based on the foregoing, BellSouth and Supra move 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 19th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



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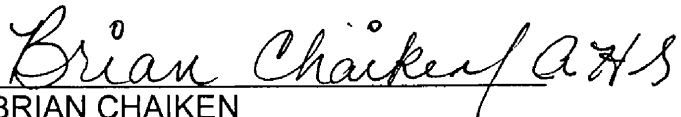
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SUPRA TELECOMMUNICATIONS AND
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BRIAN CHAIKEN

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**Certificate of Service
Docket No. 001305-TP**

I HEREBY CERTIFY that a true and correct copy of the forgoing was served via Hand Deliver and/or Federal Express this 19th day of September, 2001, to the following:

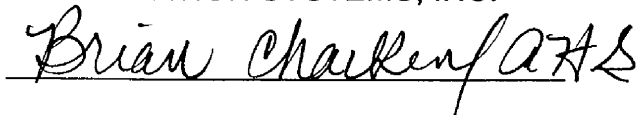
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SUPRA TELECOMMUNICATIONS AND
INFORMATION SYSTEMS, INC.

A handwritten signature in black ink that reads "Brian Chaiken" followed by a stylized set of initials "AAS". The signature is written over a horizontal line.

BRIAN CHAIKEN
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Attachment A

Ramos Confidential Direct Testimony References

Page 12, lines 13-25
Page 13, lines 1-3, 8-25
Page 14, lines 1-24
Page 15, line 1, lines 5-11
Page 25, lines 15-19
Page 35, lines 7-10
Page 47, lines 18-25
Page 48, lines 1-9

Ramos Confidential Rebuttal Testimony References

Page 5, lines 19-20
Page 10, lines 4-24
Page 11, lines 7-11, 20
Page 13, lines 1-22
Page 19, line 11
Page 35, lines 11-16
Page 37, lines 1-3
Page 40, lines 9-10
Page 48, lines 9-25
Page 49, lines 1-16, 21-25
Page 50, lines 1-7
Page 54, line 8
Page 55, lines 12-15
Page 59, lines 14-17
Page 62, lines 4-5, 10-11, 18-25
Page 63, lines 1-2
Page 66, lines 19-25
Page 67, lines 1-15
Page 68, lines 1-2
Page 71, lines 3, 5, 8, 10, 15, 16, 19-25
Page 72, lines 1-6, 12-13

Ramos Confidential Exhibits

OAR 3 – Document No. 09249-01 - Order dated June 5, 2001.
OAR 4 – Document No. 09249-01
OAR 5 – Document No. 09249-01
OAR 6 – Document No. 09249-01

OAD 7 – Document No. 09249-01 - Order dated July 20, 2001.
OAD 47 – Document No. 09249-01 - Order dated February 21, 2001.
OAD 51 – Document No. 09997-01 - Undated BellSouth e-mail
OAD 54 - Document No. 09997-01 – BST’s Motion for Reconsideration.
OAD 61 -Document No. 09997-01 BST’s redline
OAD 62 - Document No. 09997-01 – Hearing Transcripts.
OAD 63 – Document No. 09997-01 Minutes.
OAD 72 - Document No. 09997-01 Scheduling Order.
OAD 79 - Document No. 09997-01 Interrogatory 6.
OAD 80 - Document No. 09997-01 Hearing Transcripts.
OAD 81 - Document No. 09997-01 BST Manual - Module 3:
OAD 82 - Document No. 09997-01 BST Manual - October 2000.
OAD 83 - Document No. 09997-01 BST Manual - November 1997.
OAD 84 - Document No. 09997-01 BST Manual - 1/2/98.
OAD 85 - Document No. 09997-01 BST Manual - 11/14/97.
OAD 86 - Document No. 09997-01 BST Manual - June 2000.
OAD 87A - Document No. 09997-01 BST Manual - January 2001.
OAD 87B - Document No. 09997-01 BST Manual - January 2001.
OAD 88 - Document No. 09997-01 BST Manual - December 2000.
OAD 89A - Document No. 09997-01 BST Manual - 2/28/2001.
OAD 89B - Document No. 09997-01 BST Manual.
OAD 90 - Document No. 09997-01 BST Manual - February 2000.
OAD 102 - Document No. 09997-01
OAD 103 - Document No. 09997-01
OAD 104 - Document No. 09997-01 Hearing Transcripts.

Nilson Confidential Direct Testimony References

Page 39, lines 13-25, footnote 42
Page 41, lines 1-37, footnote 44
Page 42, lines 1-15, footnote 45-46
Page 47, footnote 54
Page 82, lines 21-22
Page 84, footnote 79
Page 119, lines 8-9

Nilson Confidential Rebuttal Testimony References

Page 4, footnote 1
Page 13, footnote 4
Page 25, lines 21-23

Page 26, lines 1-42
Page 27, lines 1-2, 6-41
Page 28, lines 1-6
Page 38, line 5
Page 39, lines 8-9
Page 47, lines 19-25
Page 48, lines 1-45
Page 49, lines 1-27

Nilson Confidential Exhibits

DAN-2 - Document No. 09252-01 - INTERLATA - Dated June 13, 2000.
DAN-3 - Document No. 09252-01 - 6/5/2001.
DAN-4 - Document No. 09252-01 – Spreadsheet.

Bentley Confidential Direct Testimony References

Page 9, lines 5-7, 23-25
Page 14, lines 3-5, 25

Bentley Confidential Exhibits

CB 1 – Document No. 09255-01 - June 5, 2001
CB 2 – Document No. 09255-01 - BellSouth billing

Adnan Confidential Exhibits

AZ-2 – Document No. 09995-01 – TAG
AZ-3 - Document No. 09995-01 - TAG
AZ-4 - Document No. 09995-01 - BellSouth Documentation
AZ-5 - Document No. 09995-01
AZ-6 - Document No. 09995-01
AZ-7 - Document No. 09995-01

Prehearing Confidential References

Page 1, reference to OAR 3, 4, 5, 6
Page 2, reference to OAR 7, 31, 35
Page 3, reference to OAR 51, 62
Page 4, reference to OAR 81-90, 102-104
Page 6, reference to CB 1, AZ 5-7

Page 9, portions of paragraph 1
Page 39, lines 1-3
Page 43, 1st three sentences
Page 49, 1st three sentences
Exhibit A in its entirety