

James Meza III
Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
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Tallahassee, Florida 32301
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October 12, 2001

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

RE: Docket No. 001305-TP (Supra)

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for late-filed deposition exhibit JK-2 for Jerry Kephart, 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 on the parties shown on the attached Certificate of Service.

Sincerely,


James Meza III (KA)

Enclosures

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

DOCUMENT NUMBER-DATE

13012 OCT 12 01

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
Docket No. 001305-TP**

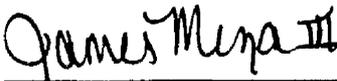
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Federal Express this 12th day of October, 2001 to the following:

Wayne Knight
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
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James Meza III (CA)

(+) Signed Protective Agreement

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: October 12, 2001
Telecommunications Act of 1996.)
_____)

**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 September 21, 2001, BellSouth filed a late-filed deposition exhibit JK-2 for Jerry Kephart, 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 late-filed deposition exhibit JK-2 contains confidential business information that is considered 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. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes. A more specific description of this information and the reasons why said information is confidential is contained in Attachment A.

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 12th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (EA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

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R. Douglas Lackey

R. DOUGLAS LACKEY (EA)

T. MICHAEL TWOMEY

675 W. Peachtree Street

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Atlanta, Georgia 30375

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 001305-TP
Request for Confidential Classification
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10/12/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE LATE FILED DEPOSITION EXHIBIT NO. JK-2 OF JERRY KEPHART, FILED SEPTEMBER 21, 2001 IN FLORIDA DOCKET NO. 001305-TP

Explanation of Proprietary Information

1. 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. 001305-TP
Request for Confidential Classification
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10/12/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE LATE FILED
DEPOSITION EXHIBIT NO. JK-2 OF JERRY KEPHART, FILED SEPTEMBER 21,
2001 IN FLORIDA DOCKET NO. 001305-TP**

JK-2

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