

T. Michael Twomey
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0750

October 29, 2001

Mrs. Blanca S. Bayó
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 (Supra-BellSouth Arbitration)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for Late-File Hearing Exhibits 8, 13, 15, 17 and 36, 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,

T. Michael Twomey
T. Michael Twomey (KA)

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

DOCUMENT NUMBER-DATE

13680 OCT 29 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 29th day of October, 2001 to the following:

Wayne Knight
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6232
Fax. No. (850) 413-6250

Supra Telecommunications and
Information Systems, Inc.
1311 Executive Center Drive
Kroger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
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mbuechele@stis.com

Brian Chaiken
Paul Turner (+)
Supra Telecommunications and
Information Systems, Inc.
2620 S. W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 476-4248
Fax. No. (305) 443-1078
bchaiken@stis.com



T. Michael Twomey (KAD)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:)
) Docket No.: 001305-TP
Petition for Arbitration of the Interconnection)
Agreement Between BellSouth)
Telecommunications, Inc. and Supra)
Telecommunications & Information System,)
Inc., Pursuant to Section 252(b) of the) Filed: October 29, 2001
Telecommunications Act of 1996.)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

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

1. On October 8, 2001, BellSouth filed late-filed hearing exhibits identified as Late-File Hearing Exhibits 8, 13, 15, 17, and 36. At that same time, BellSouth filed a Notice of Intent to Request Confidential Classification, indicating its intent to ask for confidential classification of information contained in the Late-Filed Hearing Exhibits 8, 15, and 17.

2. BellSouth hereby withdraws its Notice of Intent to Request Confidential Classification for Late-Filed Hearing Exhibit 15.

3. BellSouth hereby files this Request for Confidential Classification of Late-Filed Exhibits 8 and 17. The information contained in these exhibits furnished by BellSouth includes confidential business information. Attachment "A" to BellSouth's Request for Confidential Classification contains the specific justification for the request

for confidential classification along with a list that identifies the location of the information designated by BellSouth as confidential.

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

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

6. The information contained in BellSouth's Late-Filed Hearing Exhibits includes confidential business information that is considered proprietary to BellSouth. Therefore, such information should continue to be classified as confidential business information pursuant to Section 364.24 and Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

7. 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.

8. The original of this 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 29th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R Douglas Lackey

R. DOUGLAS LACKEY (KA)

T. MICHAEL TWOMEY

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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10/29/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S LATE FILED HEARING EXHIBITS 8 AND 17 FILED OCTOBER 8, 2001 IN FLORIDA DOCKET NO. 001305-TP

Explanation of Proprietary Information

1. This information contains substantive references to a commercial arbitration award dated June 5, 2001. Both BellSouth and Supra are bound by the existing Interconnection Agreement to keep the results of the arbitration confidential. Since the public release of this information is contractually prohibited, it is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.
2. 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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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S LATE FILED HEARING EXHIBITS 8 AND 17 FILED OCTOBER 8, 2001 IN FLORIDA DOCKET NO. 001305-TP

LATE FILED HEARING EXHIBIT NO. 8

<u>Location</u>	<u>Reason</u>
Entire Response	1

LATE FILED HEARING EXHIBIT NO. 17

<u>Location</u>	<u>Reason</u>
Entire Document	2