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January 23, 2002

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

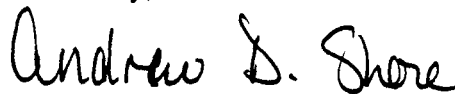
Re: Docket No. 990649A-TP (UNE Docket)

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for BellSouth's Response to Florida Digital Network Inc.'s Request for Production of Documents, Item No. 1, Attachment 1 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,



Andrew D. Shore (UKA)

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

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
Docket No. 990649A-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Federal Express this 23rd day of January, 2002 to the following:

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Andrew D. Shore
Andrew D. Shore (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No.: 990649A-TP
network element)
_____) Filed: January 23, 2002

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On January 23, 2002, BellSouth filed its Responses to Florida Digital Network's (hereinafter "FDN") 1st Set of Interrogatories and Request for Production of Documents. Request for Production, Item No. 1, Attachment 1 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 that 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.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in Attachment 1 to BellSouth's Response to FDN's Request for Production, Item No. 1 contains practices/procedures utilized by BellSouth to conduct business and other confidential business information that could cause competitive harm to BellSouth,

and is confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.

3. Attachment A to BellSouth's 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.

4. Attachment B to BellSouth's Request for Confidential Classification is a redacted version for public disclosure.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents which are confidential and proprietary

6. The information contained in Attachment 1 to BellSouth's Response to FDN's 2nd Request for Production of Documents, Item No. 1 contains practices/procedures utilized by BellSouth to conduct business and other 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. Corresponding information on competitors is not available to BellSouth. The information discussed in this Request for Specified 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 364.24 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.

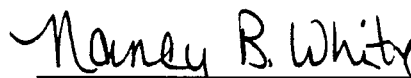
7. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

8. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services 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 23rd day of January, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
Page 1 of 2
1/23/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO FDN'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM ONE FILED JANUARY 23, 2002, IN FLORIDA DOCKET NO. 990649A-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 that 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 BellSouth uses it 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. 990649A-TP
Request for Confidential Classification
Page 2 of 2
1/23/02.**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO FDN'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM ONE
FILED JANUARY 23, 2002, IN FLORIDA DOCKET NO. 990649A-TP**

POD ITEM 1

Location

Reason

Attachment 1

1