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February 8, 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

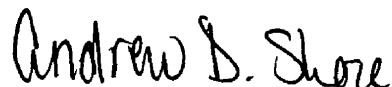
**Re: Docket No. 990649A-TP (UNE Docket)**

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for AT&T and MCI's Third Set of Interrogatories Item No. 27, Attachment 1 Item 36, Attachment 1-4 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 (UA)

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

432843

DOCUMENT NUMBER-DATE  
01557 FEB-8 2002  
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 8<sup>th</sup> day of February 2002 to the following:

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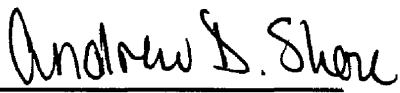
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For Network Plus

  
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: February 8, 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 February 8, 2002, BellSouth filed its Responses to AT&T and MCI's 3<sup>rd</sup> Set of Interrogatories. BellSouth's response to Interrogatory, Item Nos. 27 and 36 contain attachments which contain information that reflects BellSouth's cost to provide certain services as well as practices and procedures utilized by BellSouth to conduct business and is considered a trade secret.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Response to Interrogatory No. 27, Attachment No. 1 and BellSouth's Response to Interrogatory No. 36, Attachment Nos. 1 through 4 contain vendor-specific pricing information 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 copy of the confidential information.

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

6. The information contained in BellSouth's Response to Interrogatory No. 27, Attachment No. 1 and BellSouth's Response to Interrogatory No. 36, Attachment Nos. 1 through 4 include vendor-specific pricing information, confidential business information and customer proprietary 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.

6. 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.



7. 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.

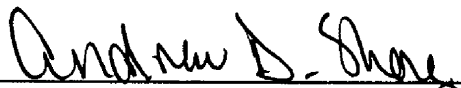
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 8<sup>th</sup> day of February, 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  
2/08/02

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO AT&T AND MCI'S THIRD SET OF INTERROGATORIES, ITEM NO. 27, ATTACHMENT 1, ITEM 36, ATTACHMENT 1-4, FILED FEBRUARY 8, 2002, IN FLORIDA DOCKET NO. 990649A-TP

### Explanation of Proprietary Information

1. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service, therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. In addition, this information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.
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 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.

BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649A-TP  
Request for Confidential Classification  
Page 2 of 2  
2/08/02

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO AT&T AND MCI'S THIRD SET OF INTERROGATORIES, ITEM NO. 27,  
ATTACHMENT 1, ITEM 36, ATTACHMENT 1-4, FILED FEBRUARY 8, 2002, IN  
FLORIDA DOCKET NO. 990649A-TP**

**Interrogatory No. 27**

<u>Location</u>	<u>Reason</u>
Attachment 1, Row 6 through and including 16	1

**Interrogatory No. 36**

<u>Location</u>	<u>Reason</u>
Attachment 1, Entire Document	2
Attachment 2, Entire Document	2
Attachment 3, Entire Document	2
Attachment 4, Entire Document	2