

Andrew D. Shore
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February 18, 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 Staff's Third Request for Production of Documents, Item No. 23, Attachment No. 1, Attachment No. 2, and Attachment No. 3 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 (WA)

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

DOCUMENT NUMBER-DATE
01890 FEB 18 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network element) Docket No.: 990649A-TP
)
) Filed: February 18, 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 18, 2002, BellSouth filed its Responses to Staff's 3rd Request for Production of Documents. BellSouth's response to Production of Documents, Item No. 23, contained Attachment No. 1, Attachment No. 2, and Attachment No. 3, each of which contain information that reflects BellSouth's cost to provide certain services. This information is used by BellSouth in conducting its business and is considered a trade secret.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in Attachment No. 1, Attachment No. 2 and Attachment No. 3 to Production of Documents, Item No. 23 includes vendor-specific pricing information and confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to BellSouth and 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, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

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 document which is confidential and proprietary.

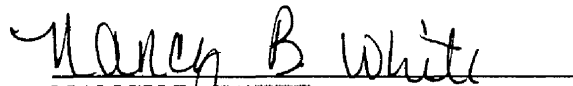
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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 18th day of February 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
E-Mail and Federal Express this 18th day of February 2002 to the following:

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Andrew D. Shore
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(+) Signed Protective Agreement

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
Page 1 of 2
2/18/02**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 23, ATTACHMENT ONE, TWO AND THREE, FILED FEBRUARY 18, 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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990649A-TP
Request for Confidential Classification
Page 2 of 2
2/18/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S THIRD REQUEST FOR PRODUCTION OF
DOCUMENTS, ITEM NO. 23, ATTACHMENT ONE, TWO AND THREE, FILED
FEBRUARY 18, 2002, IN FLORIDA DOCKET NO. 990649A-TP**

Production of Documents, Item 23

| <u>Location</u> | <u>Reason</u> |
|--|---------------|
| Attachment 1, Row 6 through and including 16 | 1 |
| Attachment 2, Row 6 through and including 16 | 1 |
| Attachment 3, Row 6 through and including 16 | 1 |