

ORIGINAL

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February 27, 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 (UNEs)

Dear Ms. 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 Fifth Set of Interrogatories, Item No. 92, Attachment 1, Item No. 96, Attachments 1, 2 and 3, and Item No. 98, Attachments 1, 2 and 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,

Nancy B. White
Nancy B. White (KA)

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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This confidentiality request was filed by or for a "telco" for DN 02322-02. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

**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 27th day of February 2002 to the following:

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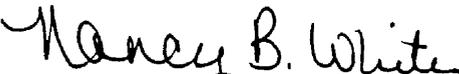
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Nancy B. White (LA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled)
network element)
_____)
Docket No.: 990649A-TP
Filed: February 27, 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 27, 2002, BellSouth filed its Responses to Staff's 5th Set of Interrogatories. BellSouth's response to Interrogatory, Item No. 92 contained Attachment No. 1, which contains information that reflects BellSouth's cost to provide certain services. BellSouth's response to Interrogatory, Item No. 96 contained Attachment No. 1, Attachment No. 2, and Attachment No. 3 which contain information that reflects BellSouth's cost to provide certain services. BellSouth's response to Interrogatory, Item No. 98 contained Attachment No. 1, Attachment No. 2, and Attachment No. 3 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, to Interrogatory Item No. 92, Attachment No. 1, Attachment No. 2 and Attachment No. 3 to Interrogatory Item No. 96, and Attachment No. 1, Attachment No. 2 and Attachment No. 3 to Interrogatory Item No. 98 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 27th 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
2/27/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIFTH SET OF INTERROGATORIES, ITEM NO. 92, ATTACHMENT ONE, ITEM NO. 96, ATTACHMENT ONE, TWO AND THREE, AND ITEM NO. 98, ATTACHMENT ONE, TWO, AND THREE, FILED FEBRUARY 27, 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
2/27/02

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO STAFF'S FIFTH SET OF INTERROGATORIES, ITEM NO. 92, ATTACHMENT
ONE, ITEM NO. 96, ATTACHMENT ONE, TWO AND THREE, AND ITEM NO. 98,
ATTACHMENT ONE, TWO, AND THREE, FILED FEBRUARY 27, 2002, IN FLORIDA
DOCKET NO. 990649A-TP**

Interrogatory Item No. 92

<u>Location</u>	<u>Reason</u>
Attachment 1, Column E, F and G	1

Interrogatory Item No. 96

<u>Location</u>	<u>Reason</u>
Attachment 1, Rows 6 through 16	1
Attachment 2, Rows 6 through 16	1
Attachment 3, Column E, F and G	1

Interrogatory Item No. 98

<u>Location</u>	<u>Reason</u>
Attachment 1, Rows 6 through 16	1
Attachment 2, Rows 6 through 16	1
Attachment 3, Column E, F and G	1