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02 MAR 14 PM 4:39

BellSouth Telecommunications, Inc.
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COMMISSION
CLERK

March 14, 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 Third Set of Interrogatories, Item Nos. 28(e) and 29 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

Andrew D. Shore
(2P)

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

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

This confidentiality request was filed by or for a "telco" for DN 03004-02. 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.
(X-ref. 02487-02)

RECEIVED & FILED
[Signature]
FPSC-BUREAU OF RECORDS

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 14TH day of March 2002 to the following:

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Andrew D. Shore (28)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled network element) Docket No.: 990649A-TP
_____) Filed: March 14, 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 March 4, 2002, AT&T Communications of the Southern States, Inc. (hereinafter "AT&T") and MCI WorldCom, Inc. (hereinafter "MCI") filed its Responses to FPSC Staff's (hereinafter "Staff") Third Set of Interrogatories. The attachments to AT&T/MCI's response to Staff's Third Interrogatories, Item Nos. 28(e) and 29 reflects BellSouth's cost to provide certain services, vendor-specific pricing information and confidential business information that is considered proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the attachments to AT&T/MCI's Response to Staff's Third Interrogatories, Item Nos. 28(e) and 29 reflects BellSouth's cost to provide certain services, 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.

DOCUMENT NUMBER-DATE

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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 two redacted copies of the proprietary information.

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

6. The information contained in the attachments to AT&T/MCI's Responses to Staff's Third Interrogatories, Item Nos. 28(e) and 29 reflects BellSouth's cost to provide certain services, 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 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.

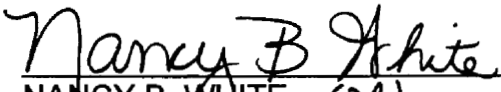
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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.

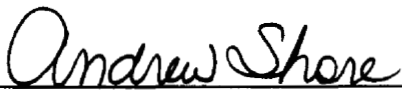
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 14th day of March, 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
3/14/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ATTACHMENTS TO AT&T/MCI'S RESPONSES TO STAFF'S THIRD INTERROGATORIES, ITEM NOS. 28(e) AND 29 AS FILED ON MARCH 4, 2002 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 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, BellSouth uses it in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret that should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.

PAGE NO.

BASIS FOR REQUEST

Attachment No. 28(e)

Lines 1-13, Columns C, D, G and H

1

Attachment No. 29

Entire Document

1