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January 23, 1996

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RE: Docket No. 950984-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. Please file these documents in the above-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 (102)
Nancy B. White

Enclosures

cc: All Parties of Record
R. G. Beatty
A. M. Lombardo
R. D. Lackey

RECEIVED & FILED

14
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00822 JAN 23 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s))
to establish nondiscriminatory) Docket No. 95098~~4~~-TP
rates, terms, and conditions for)
resale involving local exchange)
companies and alternative local) Filed: January 23, 1996
exchange companies pursuant to)
Section 364.162, Florida Statutes)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25.22.006, Florida Administrative Code, files its Request for Confidential Classification for certain information contained in answers provided to Staff in response to Staff's First Request for Production of Documents.

1. On January 2, 1996, BellSouth filed a Notice of Intent to Request Confidential Classification for certain cost information contained in the response to Items 4 and 5 of Staff's First Request for Production of Documents.

2. BellSouth has appended to this Request for Confidential Classification as Attachment "A" a listing showing the location in the answer to Item Nos. 4 and 5 of the Staff's First Request for Production of Documents, of the information designated by BellSouth as confidential, as well as the required correlation with the specific justification for confidential classification.

3. Appended hereto in a package designated as Attachment "B" are two edited copies of the answer with the confidential information deleted.

4. Appended as Attachment "C" is a sealed package

DOCUMENT NUMBER-DATE

00822 JAN 23 88

FPSC-RECORDS/REPORTING

472

containing copies of the answer with the material which is confidential and proprietary highlighted. Copies of Attachments "B" and "C" are not being served on the other parties in this proceeding.

5. With respect to the specific cost information provided in response to Items 4 and 5 of Staff's First Request for Production of Documents, this information is entitled to confidential classification on the basis that it is information relating to and affecting various competitive interests of BellSouth, the disclosure of which would impair BellSouth's business in a competitive environment. More specifically, public disclosure of this cost information would provide BellSouth's competitors and potential competitors with an advantage in that they would have access to BellSouth's cost information for providing unbundled services on a going forward basis, allowing those competitors and potential competitors to formulate more aggressive entry, marketing, pricing, and overall business strategies relating to BellSouth's services in Florida. Furthermore, BellSouth is not able to obtain comparable information from its competitors, and therefore, revealing this information will give BellSouth's competitors an inequitable and unfair advantage over BellSouth. This information is valuable cost information used by BellSouth in conducting its business and BellSouth strives to keep such information a secret. Therefore, such information is a trade secret which is considered to be proprietary confidential business information pursuant to Section

364.183(3)(a) and (e), Florida Statutes.

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

WHEREFORE, based on the foregoing, BellSouth moves the Prehearing Officer to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential, proprietary business information, and, thus, not subject to public disclosure.

Respectfully submitted this 23rd day of January, 1996.

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CERTIFICATE OF SERVICE
Docket No. 950984-TP

I HEREBY CERTIFY that a copy of the foregoing has been
furnished by Federal Express this 23rd day of January, 1996 to:

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Attachment A

FPSC DOCKET 950984-TP

FPSC STAFF'S 1ST REQUEST FOR DOCUMENTS ITEMS 4 & 5

Explanation for Proprietary Information

- A. This material is proprietary and confidential business material that contains cost information extracted from BellSouth's Unbundled Termination Cost Study and the Unbundled Exchange Access Loop Cost Study. These costs reflect BellSouth's usage costs of providing service on a going forward basis and would be useful to interconnection competitors and potential competitors, as well as other interconnectors in making decisions regarding entry, pricing, marketing and overall business strategies. BellSouth is not able to obtain this information from its competitors or interconnectors, therefore, it would be inequitable and unfair for BellSouth's competitors and interconnectors 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 Section 364.183, Florida Statutes and is exempt from the Open Records Act.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL.NOS.</u>
F18B01Z 0000	ALL NUMBERS APPEARING IN THE FOLLOWING LINES/COLUMNS
002	4,6,7,9,10
003-012	11-23 All Numbers appearing in columns titled Capital Investment, Operating Investment, Annual Expenses, Summary.
013-014	All numbers in column titled Amount. Line 6-59.
016-017	All numbers in columns titled Monthly Cost and Nonrecurring Cost.
019	10-18
020	23-52
021	Columns titled Investment and Total Investment
022	23-52
023	Columns titled Investment and Total Investment
024	4,10-20
025	10-40
026	4-6
027	5,9-11,13-16,21-26,28-31,36-41
028-029	Columns A-I
030	Column Titled Amount
031	9
032	Columns A,C,E,G,I,J,K,M,N,O,P,

PAGE NO.

LINE/COL.NOS.

F18B01Z 0000

033 7,10,11,12
034-035 7-11
036-038 COLUMNS C,D,F,G,H,I,
044 7
062 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
063 COLUMNS d,e,f,g,i,j
064 COLUMNS c,d,f,g,i,j
065 COLUMNS c,d,e,f,g,h,i,j
066 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
067 COLUMNS MATRIX 2,3,4,5,6,7,8
068 COLUMNS d,e,f,g,i,j,
069 COLUMNS c,d,f,g,i,j
070 COLUMNS c,d,e,f,g,h,i,j
071 COLUMNS A,B,D=A*C,B*C,MATRIX 2,MATRIX 4
072 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
073 COLUMNS d,e,f,g,i,j
074 COLUMNS c,d,f,g,i,j
075 COLUMNS c,d,e,f,g,h,i,j
076 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
077 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
078 COLUMNS d,e,f,g,i,j
079 COLUMNS c,d,f,g,i,j
080 COLUMNS c,d,e,f,g,h,i,j
081 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
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083 COLUMNS d,e,f,g,i,j
084 COLUMNS c,d,f,g,i,j
085 COLUMNS c,d,e,f,g,h,i,j
086 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
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089 COLUMNS c,d,f,g,i,j
090 COLUMNS c,d,e,f,g,h,i,j
091 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
092 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
093 COLUMNS d,e,f,g,i,j
094 COLUMNS c,d,f,g,i,j
095 COLUMNS c,d,e,f,g,h,i,j
095 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
097 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
098 COLUMNS d,e,f,g,i,j
099 COLUMNS c,d,f,g,i,j
100 COLUMNS c,d,e,f,g,h,i,j
101 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
102 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8
103 COLUMNS d,e,f,g,i,j
104 COLUMNS c,d,f,g,i,j
105 COLUMNS c,d,e,f,g,h,i,j
106 COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
107 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5,6,7,8

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108 COLUMNS d,e,f,g,i,j
 109 COLUMNS c,d,f,g,i,j
 110 COLUMNS c,d,e,f,g,h,i,j
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 120 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 121 NUMBERS IN COLUMNS A,B,D=C*A,B*C,MATRIX 2,MATRIX 4
 122 NUMBERS IN COLUMNS A, E, F
 123 NUMBERS IN COLUMNS A, E, F,
 124 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 125 NUMBERS IN COLUMNS A, E, F
 126 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 127 NUMBERS IN COLUMNS A, E, F
 128 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 129 NUMBERS IN COLUMNS A, E, F
 130 NUMBERS IN COLUMNS B,C,D,E,F,G,H
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 132 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 133 NUMBERS IN COLUMNS A, E, F
 134 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 135 NUMBERS IN COLUMNS A, E, F
 136 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 137 NUMBERS IN COLUMNS A, E, F
 138 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 139 NUMBERS IN COLUMNS A, E, F
 140 NUMBERS IN COLUMNS B,C,D,E,F,G,H
 141 LINES 7-15,21-23,30-38
 142 LINES 9-11,22-24
 143 LINES LINES 11-13, 20-28
 144 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 145 NUMBERS IN COLUMNS d,e,f,g,i,j
 146 NUMBERS IN COLUMNS c,d,f,g,i,j
 147 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 148 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
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 152 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 153 NUMBERS IN COLUMNS d,e,f,g,i,j
 154 NUMBERS IN COLUMNS c,d,f,g,i,j

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155 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 156 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 157 NUMBERS IN COLUMNS e,g,j
 158 NUMBERS IN COLUMNS d,g,j
 159 NUMBERS IN COLUMNS d,f,h,j
 160 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 161 NUMBERS IN COLUMNS e,g,j
 162 NUMBERS IN COLUMNS d,g,j
 163 NUMBERS IN COLUMNS d,f,h,j
 164 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 165 NUMBERS IN COLUMNS e,g,j
 166 NUMBERS IN COLUMNS d,g,j
 167 NUMBERS IN COLUMNS d,f,h,j
 168 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 169 NUMBERS IN COLUMNS c,d,f,g,i,j
 170 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 171 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 172 NUMBERS IN COLUMNS d,e,f,g,i,j
 173 NUMBERS IN COLUMNS c,d,f,g,i,j
 174 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
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 178 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
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 180 NUMBERS IN COLUMNS d,e,f,g,i,j
 181 NUMBERS IN COLUMNS c,d,f,g,i,j
 182 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 183 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 184 NUMBERS IN COLUMNS d,e,f,g,i,j
 185 NUMBERS IN COLUMNS c,d,f,g,i,j
 186 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 187 NUMBERS IN COLUMNS TITLED "MATRIX" 2,3,4,5
 188 NUMBERS IN COLUMNS d,e,f,g,i,j
 189 NUMBERS IN COLUMNS c,d,f,g,i,j
 190 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 191 NUMBERS IN COLUMNS A, B, C
 192 NUMBERS IN COLUMNS d,e,f,g,i,j
 193 NUMBERS IN COLUMNS c,d,f,g,i,j
 194 NUMBERS IN COLUMNS c,d,e,f,g,h,i,j
 195 LINES 9-11, 14-16, 19-21, 24-26, 30, 31, 33-35, 37, 40, 42, 44-50
 196 NONE
 197 NUMBERS IN COLUMNS MONTHLY COPPER TECHNOLOGY, MONTHLY PAIR
 GAIN ON COPPER, MONTHLY PAIR GAIN ON FIBER, MONTHLY ECONOMICAL
 COST.
 198 LINE 7
 199 LINE 12
 200 NONE
 201-213 NUMBERS IN COLUMNS C,D,E,F,G,H
 214 NUMBERS IN COLUMNS LEVELIZED INVESTMENT, ANNUAL COST, MONTHLY
 COST.
 215-231 NUMBERS IN COLUMNS B, C, D
 232 NUMBERS IN COLUMNS INVESTMENTS
 233-235 NUMBERS UNDER ALL COLUMNS

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