

NANCY B. WHITE Assistant General Counsel-Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

January 20, 1998

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

#### RE: Docket Nos. 960833-TP/960846-TP/960757-TP (Cost Dockets)

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Staff's Third Set of Interrogatories No. 39 and Staff's Third Request for Production of Documents Nos. 41 and 42, 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 on the parties shown on the attached Certificate of Service.

ACK		Sincerely,
AFA	(	n polit
APP		ancy B. White
CAF		Nancy B. White ( n. )
CMU		$(\Im \mathcal{P})$
CTR Enclosures		
EAG cc: All P	arties of Record	This Notice of Intent was filed with Confidential
A. M	. Lombardo	Document No. 01063-98 The document
LIN R. G	. Beatty	has been placed in the confidential files pending
OPC W. J	. Ellenberg	receipt of a request for confidential treatment.
RECEIVED	Of I Have a	
SEC	CREAU OF RECORDS	
WAS FPSC-BUR		DOCUMENT NUMBER-DATE
OTH		01062 JAN 20 8
		FPSC-RECORDS/REPORTING

### CERTIFICATE OF SERVICE DOCKET NOS. 960833-TP, 960846-TP and 960757-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

Federal Express this 20th day of January, 1998 to the following:

Monica Barone Charles J. Pelligrini Staff Counsel Division of Legal Services Florida Public Service Comm. 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6187 (850) 413-6250

Tracy Hatch, Esq. (+) Michael W. Tye, Esq. 101 N. Monroe Street Suite 700 Tallahassee, Florida 32301 Attys. for AT&T Tel. (850) 425-6364 Fax. (850) 425-6361

Mark A. Logan, Esq. Brian D. Ballard, Esq. Bryant, Miller & Olive, P.A. 201 S. Monroe Street Tallahassee, Florida 32301 Attys. for AT&T Tel. (850) 222-8611 Fax. (850) 224-1544

Richard D. Melson, Esq. Hopping Green Sams & Smith 123 South Calhoun Street P.O. Box 6526 Tallahassee, Florida 32314 Tel. (850) 222-7500 Fax. (850) 224-8551 Atty. for MCImetro Floyd R. Self, Esq. (+)
Messer, Caparello, Madsen, Goldman & Metz, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32302-1876
Tel. (850) 222-0720
Fax. (850) 224-4359
Atty. for WorldCom, Inc.

Mr. Brian Sulmonetti (+) Director, Regulatory Affairs WorldCom, Inc. 1515 South Federal Highway, Suite 400 Boca Raton, FL 33432 Tel. (561) 750-2940 Fax. (561) 750-2629

C. Everett Boyd, Jr. Ervin, Varn, Jacobs, Odom & Ervin 305 South Gadsden Street Post Office Drawer 1170 Tallahassee, FL 32302 Tel. (850) 224-9135 Fax. (850) 222-9164

Mr. Thomas K. Bond (+) MCI Metro Access Transmission Services, Inc. 780 Johnson Ferry Road Suite 700 Atlanta, GA 30342 Brad Mutschelknaus Kelley Drye & Warren, L.L.P. Suite 500 1200 19th Street, N.W. Washington, D.C. 20036

•

Patrick K. Wiggins Wiggins & Villacorta 501 East Tennessee St. P.O. Drawer 1657 Tallahassee, FL 32302 Atty. for Intermedia

Steve Brown Intermedia Comm. Inc. 3625 Queen Palm Drive Tampa, FL 33610-1309

Peter M. Dunbar, Esq. Barbard D. Auger, Esq. Pennington, Moore, Wilkinson & Dunbar, P.A. 215 South Monroe Street 2nd Floor Tallahassee, FL 32301 Tel. (850) 222-3533 Fax. (850) 222-2126 Atty. for Time Warner

Carolyn Marek Vice President of Regulatory Affairs Southeast Region Time Warner Comm. 2828 Old Hickory Boulevard Apt. 713 Nashville, Tennessee 37221 Tel. (615) 673-1191 Fax. (615) 673-1192

Benjamin Fincher, Esq. Sprint Communications Company Limited Partnership 3100 Cumberland Circle Atlanta, GA 30339 (+) Protective/Non-Disclosure Agreement

3. White hite ( ng)



# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T Communications of the Southern States, Inc., and MCI Telecommunications Corporation, MCI Metro Access Transmission Services, Inc., for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996	<pre>) Docket No. 960833-TP ) ) Docket No. 960846-TP ) ) ) ) ) ) ) ) )</pre>
In the matter of	) ) Docket No. 960757-TP
MFS Communications Company, Inc.	)
Petition for Arbitration Pursuant to 47 U.S.C. § 252(b) of Interconnection Rates, Terms, and Conditions with	) ) ) )
BellSouth Telecommunications, Inc.	, ) _) Filed: January 20, 1998

## BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, inc. ("BellSouth" or

"Company"), and pursuant to Rule 25-22.006, Florida Administrative Code,

files its Notice of Intent to Request Specified Confidential Classification.

1. On November 24, 1997, the Staff of the Florida Public Service

Commission ("Staff") served its Third Set of Interrogatories and Third

Request for Production of Documents on BellSouth. On December 2, 1997,

BellSouth filed its Objections to Staff's Third Request for Production and on

DOCUMENT NUMBER-DATE

01062 JAN 20 8

FPSC-RECORDS/REPORTING

December 9, 1997, BellSouth filed its Response and Objections to Staff's Third Request for Production. On January 13, 1998, Staff filed a Motion to Compel. As a result of discussions with Staff, BellSouth has agreed to provide a revised response to Interrogatory No. 39 and to allow Staff to inspect documents that may be responsive to Request for Production Nos. 41 and 42. These documents are highly proprietary and may be viewed at BellSouth's offices located at 150 South Monroe Street, Suite 400 in Tallahassee. In order to provide Staff with the revised interrogatory response and in order to allow Staff to review potentially responsive documents, BellSouth is now filing a Notice of Intent to Request Specified Classification for Interrogatory No. 39 and Request for Production Nos. 41 and 42. The responses to this discovery contain information considered to be confidential and proprietary to BellSouth in the above captioned docket.

2. The information contained in these documents is proprietary to BellSouth and includes information containing, among other things, financial information. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

3. Because this information contains proprietary information, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3)(a), Florida Administrative

2

Code, in order to allow the Commission to take possession of the interrogatory response and to inspect the documents without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

-

Respectfully submitted this 20th day of January, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATT

NANCY B. WHITE c/o Nancy Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5555

R. DOUGLAS LACKEY J. PHILLIP CARVER BENNETT L. ROSS 675 West Peachtree Street, Suite 4300 Atlanta, GA 30375 (404) 335-0711

BellSouth Telecommunications, Inc. Docket No. 960833-TP Staff's 3rd Set of Interrogatories November 24, 1997 Item No. 39 (Revised 01/20/98) Page 1 of 1

#### **PROPRIETARY RESPONSE**

REQUEST: What was BellSouth Enterprise's pretax interest coverage ratio, total debt to total capital ratio, funds from operations interest coverage ratio, and net cashflow to total debt ratio for the fiscal year-ends 1994, 1995, 1996, and through the third quarter of 1997?

#### **RESPONSE:**

BST objects to this request on the grounds that it is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

By way of further answer, BST does have a figure representing the Debt to Capital ratio for BellSouth Enterprise Consolidated for the fiscal year-end 1994. This information constitutes confidential proprietary business information. BST is making this information available for review by the Staff subject to a notice of intent to request confidential classification. BST does not have the debt to capital ratio for any of the other requested periods nor any of the other items requested for BellSouth Enterprises, Inc. The confidential number for the Debt to Capital ratio for BellSouth Enterprise Consolidated for the fiscal year-end 1994 is

As further information, one may derive the Debt to Capital ratio for BellSouth, excluding the regulated operating companies, from publicly available information in the Consolidated Balance Sheets of BellSouth Corporation and BellSouth Telecommunications, Inc., which appear in the annual 10-K and the quarterly 10-Q forms. The derived total debt to total capital ratios is the inverse relationship to the information provided in response to Item No. 36.

Year	Debt to Capital Ratio
1994	33.37%
1995	31.29%
1996	29.88%
1997*	28.30%

\* As of third quarter 1997

### **PROPRIETARY RESPONSE**