

RECEIVED FPSC

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OCT -5 PM 4:54

RECEIVED AND REPORTING

October 5, 1998

Mrs. Eilanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request For Confidential Classification, which we served today. Please file them in the captioned matter.

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.

RECEIVED & FILED

Sincerely,

*J. Phillip Carver*

J. Phillip Carver (PWC)

- ACM \_\_\_\_\_
- AFB \_\_\_\_\_
- AFI \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC \_\_\_\_\_
- WAS \_\_\_\_\_
- DTH \_\_\_\_\_

FPSC-BUREAU OF RECORDS

Enclosures

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II (w/o enclosures)

x-ref DN 10656-98  
DOCUMENT NUMBER-DATE

10952-OCT-5 98

FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost )  
of Basic Local Telecommunications ) Docket No.: 980696-TP  
Service, pursuant to Section 364.025, )  
Florida Statutes )  
\_\_\_\_\_ ) Dated: October 5, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Rule 25-22.003, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. On September 14, 1998, BellSouth filed its Response and Objections to Staff's Second Request for Production of Documents. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification of the subject information.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing of the location of the information designated by BellSouth as proprietary.

3. Appended hereto as Attachment B are two copies of the subject exhibit with the proprietary information deleted.

4. Appended hereto as Attachment C is a sealed envelope containing one copy of the exhibit, including the material which is proprietary.

5. The subject information is related to prices that BellSouth has negotiated with specific vendors. Specifically, the subject information entails the prices, frequently discounted, that BellSouth receives on particular items of equipment. If this information were publicly disclosed, it would impair BellSouth's ability to obtain favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 164.183(3)(d).

6. Other information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 364.183(3)(e).

7. Finally, some of the subject information includes practices and procedures developed by BellSouth. Those practices and procedures are not publicly disclosed, and were developed by BellSouth only by expending a great deal of time and money. Accordingly, this information constitutes trade secrets entitled to confidential classification pursuant to F.S. § 364.183(3)(a).

8. 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.

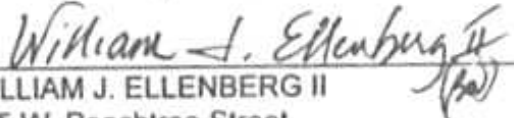
9. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

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

Respectfully submitted this 5th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
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136063

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980696-TP  
Staff's 2<sup>nd</sup> Document Request  
Request for Confidential Classification  
Page 1  
10/05/98

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 2<sup>nd</sup> REQUEST FOR DOCUMENTS ON AUGUST 18, 1998 IN DOCKETS 980696-TP

### Explanation of Proprietary Information

1. The subject information is related to prices that BellSouth has negotiated with specific vendors. Specifically, the subject information entails the prices, frequently discounted, that BellSouth receives on particular items of equipment. If this information were publicly disclosed, it would impair BellSouth's ability to obtain favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to F. S. § 364.183(3)(d).
2. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to F. S. § 364.183(3)(e).
3. The subject information includes practices and procedures developed by BellSouth. Those practices and procedures are not publicly disclosed, and were developed by BellSouth only by expending a great deal of time and money. Accordingly, this information constitutes trade secrets entitled to confidential classification pursuant to F. S. § 364.183(3)(a).

DOCUMENT REQUEST ITEM 2

<u>Page</u>	<u>Column(s)</u>	<u>Line(s)</u>	<u>Reason</u>
1	A,B,D,F,G,H	All	2
2	A,B,F,G,H	All	2
3	A,B,C,D	1-3, 5-6, 8-12, 14-18, 20-24	1
4	A,B,C,D	1, 3-7, 9-13, 15-17	1
5	J,N,O,Q	All	2
5	Note 1	All	2
5	Note 2	All	2
6	J,L,M,N	All	2
6	Note 1	All	2
6	Note 2	All	2
7	J	All	2
7	Note 1	All	2
8	J,L,M,N	All	2
8	Note 1	All	2
8	Note 2	All	2
9	J,L	All	2
9	Note 1	All	2
10	A,B,C,D,E,F	All	2
11	A,B,C,D,E,F	All	2
12	A,B,C,D,E,F,G	All	2
13	A,B,C,D,E,F,G	All	2

**DOCUMENT REQUEST ITEM 5**

RI: 98-04-028 BT

<u>Page No.</u>	<u>Line Nos./Col. No.</u>	<u>Reason</u>
1	33-39	1,2
2	1-28	1,2
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3	1-4	2
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6	Entire Page	1
7	Entire Page	2
8	Entire Page	2
9	Entire Page	2
10	Entire Chart	1,2
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12	Entire Page	1,2

BellSouth Telecommunications, Inc.  
FPSC Docket 980696-TP  
Staff's 2<sup>nd</sup> Document Request  
Request for Confidential Classification  
Page 4  
10/05/98

RL: 95-11-009 BT

<u>Page No.</u>	<u>Line Nos./Col. No.</u>	<u>Reason</u>
1	27-31	2,3
1	32-36	1
1	37-40	2
2	1-12	2
2	13-17	1,2
2	18-30	2
3	1-26	2
3	31-42	2
4	1-30	2
4	31-34	1,2
5	1-14	2
9	1-40	2,3
9	41-43	1,2
10	Entire Page	1,2,3
11	Entire Page	1,2,3
12	Entire Page	2,3
13	4-20	2
14	3-45	2,3
15	1-10	2
15	11-46	1,2
16	1-34	1,2
16	35-44	2
17	Entire Page	2
18	1-19	2
18	20-42	1,2
19	Entire Page	1,2
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21	1-24	2
21	25-44	1,2
22	Entire Page	1,2
23	Entire Page	1
24	Entire Page	3
25	Entire Page	3
26	Entire Page	3
27	Entire Page	3



**CERTIFICATE OF SERVICE  
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and \*Hand Delivery this 5th day of October, 1998 to the following:

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10952 OCT-5 98

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(+) Protective Agreements