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Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

98 OCT 16 PH 4: 57

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

RECO. US AND REPORTING

October 16, 1998

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

Re: Docket No. 980800-TP (Supra Collocation)

Dear Ms. Bayó:

RECEIVED & FILED

OTH ____

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Specified Confidential Classification for Staff's copies of BellSouth's Responses to Supra's First and Second Requests for Production of Documents, 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.

| | , | OF RECORDS | Nancy B. White |
|-------|----------|--|----------------|
| CK . | | · | (d) |
| FA . | | NBW/vf | |
| PP. | | Enclosure | |
| AF. | | cc: All parties of record | |
| MU. | | A. M. Lombardo | |
| CTR . | | R. G. Beatty | |
| EAG | | William J. Ellenberg II | |
| LEG | | | |
| LIN | | | |
| OPC | | This Notice of Intent was filed with | |
| RCH | | Document No. 1596-98. | |
| SEC | <u> </u> | has been placed in the confidentia receipt of a request for confidentia | |
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CERTIFICATE OF SERVICE Docket No. 980800-TP

HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express and * Hand-Delivery this 16th day of October, 1998 to the following:

Beth Keating, Esq. *
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6199
(850) 413-6250

Suzanne Fannon Summerlin, Esq. *
Supra Telecommunications and
Information Systems, Inc.
1311-B Paul Russell Rd., #201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589

Supra Telecommunications and Information Systems, Inc. 2620 S.W. 27th Avenue Miami, FL 33133 Tel. No. (305) 476-4220 Fax. No. (305) 476-4282

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375

Nancy B. White (21)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In Re: Petition for Emergency Relief of Supr | ra) | Docket No. 980800-TP |
|--|-----|-------------------------|
| Telecommunications and Information |) | |
| Systems, Inc., Against BellSouth |) | |
| Telecommunications, Inc. |) | |
| |) | Filed: October 16, 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 August 4, 1998, Supra Telecommunications and Information Systems, Inc. ("Supra") served its First Request for Production of Documents, Nos. 1 through 22 on BellSouth. On September 3, 1998, BellSouth filed its Responses and Objections to Supra's First Request for Production, and produced certain confidential documents pursuant to a Protective Agreement. On October 13, 1998, Staff requested a copy of these documents. In order to allow Staff to have copies of certain documents, specifically Request for Production Nos. 6, 8, 9, 17 and 19, BellSouth is now filing a Notice of Intent to Request Specified Classification for Request for Production Nos. 6, 8, 9, 17, and 19. The responses to this discovery contain information considered to be confidential and proprietary to BellSouth in the above captioned docket.
- On September 15, 1998, Supra served its Second Request for
 Production of Documents, Nos. 23 through 56 on BellSouth. On September 23,
 1998, BellSouth filed its Objections to Supra's Second Request for Production,

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and on October 14, 1998, BellSouth filed its Responses and Objections to Supra's Second Request for Production, and produced certain confidential documents pursuant to a Protective Agreement. On October 13, 1998, Staff requested a copy of these documents. In order to allow Staff to have copies of certain documents, specifically Request for Production Nos. 24, 27, 28, 32, 33, 34, 35, 36, 43, 44, 45, 49, 50, and 54, BellSouth is now filing a Notice of Intent to Request Specified Classification for Request for Production Nos. 24, 27, 28, 32, 33, 34, 35, 36, 43, 44, 45, 49, 50, and 54. The responses to this discovery contain information considered to be confidential and proprietary to BellSouth in the above captioned docket.

- 3. The information contained in these documents is proprietary to BellSouth and includes information containing, among other things, vendor specific and customer-specific information. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.
- 4. 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 Code, in
 order to allow the Commission to take possession of the production responses
 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 16th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATT

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

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