

J. PHILLIP CARVER  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

RECEIVED  
DEC 22 PM 4:43  
LEGAL DEPT  
TALLAHASSEE, FL

December 22, 1998

ORIGINAL

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. 980696-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification. Please file this document 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.

Sincerely,

J. Phillip Carver (cc)

J. Phillip Carver

RECEIVED & FILED  
980696-TP  
DIVISION OF RECORDS

Enclosures

cc: All parties of record  
A. M. Lombardo  
N. B. White  
William J. Ellenberg II (w/o enclosures)

all to Matilda

14484 DEC 22 8

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Determination of the Cost )  
of Basic Local Telecommunications ) Docket No.: 980696-TP  
Service, pursuant to Section 364.025, )  
Florida Statutes )  
\_\_\_\_\_ ) Dated: December 22, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. On December 2, 1998, BellSouth filed a CD Rom, which is a Supplement to Hearing Exhibit No. 48 (Late Filed Exhibit No. 1 to the Deposition of Kevin Duffy-Deno). 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. The subject information is electronically stored. Accordingly, BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the specific data fields for which confidential classification is requested and a field-by-field justification for the request.

3. BellSouth has appended to this Request as Attachment B a redacted paper copy of the data field[s] for which confidential classification is requested.

4. BellSouth has appended to this Request as Attachment C a highlighted paper copy of the data field[s] for which confidential classification is requested.

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 types of switching equipment. If the switch discount(s) that BellSouth receives were publicly disclosed, this disclosure 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. 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 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 information that is not subject to public disclosure.

Respectfully submitted this 22nd day of December, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (cc)

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5555

William J. Ellenberg II (cc)

WILLIAM J. ELLENBERG II

J. PHILLIP CARVER

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0711

144916

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980696-TP  
Request for Confidential Classification  
Page 1  
12/22/98

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED AS A SUPPLEMENT TO HEARING EXHIBIT NO. 48 (LATE-FILED DEPOSITION EXHIBIT NO. 1 TO KEVIN DUFFY-DENO) FILED DECEMBER 2, 1998, IN DOCKET 980696-TP

#### Explanation and Location of Proprietary Information

The subject proprietary information is located on a CD-ROM. It can be accessed by running the FLINSTALLPRI.EXE program and accepting default directory setup. The proprietary information will be located in the spreadsheet file BCPM31/MODULES/INPUT/INPUT.XLS.

The proprietary information in this spreadsheet is all the percentages located in the fields found under the Switch Discount Tab. This information contains the specific switch vendor price discounts that BellSouth receives on particular items of equipment. If this information were publicly disclosed, it would impair BellSouth's ability to negotiate favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to Section 364.183 Florida Statute and is exempt from the Open Records Act.

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket 980696-TP  
Request for Confidential Classification  
Page 1  
12/22/98**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED AS A  
SUPPLEMENT TO HEARING EXHIBIT NO. 48 (LATE-FILED DEPOSITION  
EXHIBIT NO. 1 TO KEVIN DUFFY-DENO) FILED DECEMBER 2, 1998, IN  
DOCKET 980696-TP**

**2 Redacted Copies of Material for Public Record**

14486 DEC 22 1998

**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 this 22nd day of December, 1998 to the following:

**Jack Shreve, Esquire**  
**Charles Beck, Esquire**  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Rm. 812  
Tallahassee, Florida 32399-1400  
Tel. No. (850) 488-9330  
Fax. No. (850) 488-4491

**Michael Gross, Esquire (+)**  
Assistant Attorney General  
Office of the Attorney General  
PL-0 1 The Capitol  
Tallahassee, Florida 32399-1050  
Tel. No. (850) 414-3300  
Fax. No. (850) 488-6589

**Hand Deliveries:**  
The Collins Building  
107 West Gaines Street  
Tallahassee, FL 32301

**Tracy Hatch, Esquire (+)**  
AT&T  
101 N. Monroe Street, Suite 700  
Tallahassee, Florida 32301  
Tel. No. (850) 425-6364  
Fax. No. (850) 425-6361

**Richard D. Melson, Esquire**  
Hopping, Green, Sams & Smith, P.A.  
123 South Calhoun Street  
Tallahassee, Florida 32314  
Tel. No. (850) 425-2313  
Fax. No. (850) 224-8551  
Atty. for MCI

**Thomas K. Bond**

**MCI Metro Access Transmission Services, Inc.**  
780 Johnson Ferry Road  
Suite 700  
Atlanta, GA 30342  
Tel. No. (404) 267-6315  
Fax. No. (404) 267-5992

**Robert M. Post, Jr.**  
ITS  
16001 S.W. Market Street  
Indiantown, FL 34956  
Tel. No. (561) 597-3113  
Fax. No. (561) 597-2115

**Charles Rehwinkel**  
Sprint-Florida, Inc.  
1313 Blair Stone Road,  
MC FLTHOO 107  
Tallahassee, Florida 32301  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777

**Carolyn Marek**  
VP-Regulatory Affairs  
S.E. Region  
Time Warner Telecom  
233 Bramerton Court  
Franklin, Tennessee 37069  
Tel. No. (615) 376-6404  
Fax. No. (615) 376-6405

**Norman H. Horton, Jr., Esquire (+)**  
Messer, Capareello & Self P. A.  
215 South Monroe Street  
Suite 701  
Tallahassee, Florida 32301

Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents e.spire<sup>®</sup>

**David B. Erwin, Esquire**  
Attorney-at-Law  
127 Riversink Road  
Crawfordville, Florida 32327  
Tel. No. (850) 926-9331  
Fax. No. (850) 926-8448  
Represents GTC, Frontier,  
ITS and TDS

**Floyd R. Self, Esquire**  
Messer, Caparello & Self, P.A.  
215 South Monroe Street  
Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents WorldCom

**Kimberly Caswell, Esquire**  
GTE Florida Incorporated  
201 North Franklin Street  
16th Floor  
Tampa, Florida 33602  
Tel. No. (813) 483-2617  
Fax. No. (813) 204-8870

**Jeffry J. Wahlen, Esquire**  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, Florida 32301  
Tel. No. (850) 425-5471 or 5487  
Fax. No. (850) 222-7560  
Represents ALLTEL, NEFTC,  
and Vista-United

**Tom McCabe**  
TDS Telecom  
107 West Franklin Street  
Quincy, FL 32351  
Tel. No. (850) 875-5207  
Fax. No. (850) 875-5225

**Peter M. Dunbar, Esquire**  
**Barbara D. Auger, Esquire**  
Pennington, Moore, Wilkinson,

& Dunbar, P. A.  
215 South Monroe Street  
2nd Floor  
Tallahassee, Florida 32301  
Tel. No. (850) 222-3533  
Fax. No. (850) 222-2126

**Brian Sulmonetti**  
WorldCom, Inc.  
1515 South Federal Highway  
Suite 400  
Boca Raton, FL 33432  
Tel. No. (561) 750-2940  
Fax. No. (561) 750-2629

**Kelly Goodnight**  
Frontier Communications  
180 South Clinton Avenue  
Rochester, New York 14646  
Tel. No. (716) 777-7793  
Fax. No. (716) 325-1355

**Laura Gallagher (+)**  
VP-Regulatory Affairs  
Florida Cable Telecommunications  
Association, Inc.  
310 N. Monroe Street  
Tallahassee, Florida 32301  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676

**Mark Ellmer**  
GTC Inc.  
502 Fifth Street  
Port St. Joe, Florida 32456  
Tel. No. (850) 229-7235  
Fax. No. (850) 229-8689

**Harriet Eudy**  
ALLTEL Florida, Inc.  
206 White Avenue  
Live Oak, Florida 32060  
Tel. No. (904) 364-2517  
Fax. No. (904) 364-2474

**Lynne G. Brewer**  
Northeast Florida Telephone Co.  
130 North 4th Street



Maccleddy, Florida 32063  
Tel. No. (904) 259-0639  
Fax. No. (904) 259-7722

**James C. Falvey, Esquire**  
e.spire<sup>®</sup> Comm. Inc.  
133 National Business Pkwy.  
Suite 200  
Annapolis Junction, MD 20701  
Tel. No. (301) 361-4298  
Fax. No. (301) 361-4277

**Lynn B. Hall**  
Vista-United Telecomm.  
3100 Bonnet Creek Road  
Lake Buena Vista, FL 32830  
Tel. No. (407) 827-2210  
Fax. No. (407) 827-2424

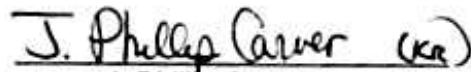
**William Cox**  
Staff Counsel  
Florida Public Svc. Comm.  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6204  
Fax. No. (850) 413-6250

**David V. Dimlich, Esq.**  
Legal Counsel  
Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4235  
Fax. No. (305) 443-1078

**Paul Kouroupas**  
**Michael McRae, Esq.**  
Teleport Comm. Group, Inc.  
2 Lafayette Centre  
1133 Twenty-First Street, N.W.  
Suite 400  
Washington, D.C. 20036  
Tel. No. (202) 739-0032  
Fax. No. (202) 739-0044

**Joseph A. McGlothlin**  
**Vicki Gordon Kaufman**  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525

**Charles Murphy**  
**Booter Imhof**  
Utilities and Comm. Committee  
428 House Office Building  
402 South Monroe Street  
Tallahassee, FL 32399-1300

  
J. Phillip Carver

(+) Protective Agreements