

ORIGINAL

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Legal Department

BellSouth Telecommunications, Inc.  
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LEGAL DEPARTMENT

January 15, 1999

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

RE: Docket No. 981052-TP

Dear Mrs. Bayo:

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

Sincerely,

*Mary K. Keyer (kk)*  
Mary K. Keyer

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OFC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enclosures

cc: All Parties of Record  
M. M. Criser, III  
N. B. White  
W. J. Ellenberg (w/o enclosures)

RECEIVED & FILED

FPSR BUREAU OF RECORDS

X-ref 1424-92  
DOCUMENT NUMBER-DATE  
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FPSR DIV. OF RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 981052-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail this 15<sup>th</sup> day of January, 1999, to the following:

Andrea K. Welch  
Telephone Company of Central  
Florida, Inc.  
3599 W. Lake Mary Boulevard  
Suite E  
Lake Mary, Florida 32746  
(407) 328-5002

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman,  
Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
(850) 222-2525  
Attys. for TCCF

Mary K. Reyer (kr)  
Mary K. Reyer

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of:

PETITION OF TELEPHONE COMPANY OF )  
CENTRAL FLORIDA (TCCF) FOR ARBITRATION ) Docket No: 981052-TP  
OF RESALE AGREEMENT WITH BELLSOUTH )  
TELECOMMUNICATIONS, INC., PURSUANT )  
TO THE TELECOMMUNICATIONS ACT OF 1996) Filed: January 15, 1999  
\_\_\_\_\_)

**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 of its TELRIC Calculator used to derive the results in Exhibit DDC-2 as requested by the Staff in Request 10 of Staff's First Expedited Request for Production of Documents (Nos. 1 to 10). 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.

DOCUMENT NUMBER-DATE

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FPSC-BEFORE REPORTING

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 Fla. Stat. § 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 15th day of January, 1999.

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

MARY K. KEYER

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0711

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## ATTACHMENT A

BellSouth Telecommunications, Inc.  
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1/15/99

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO STAFF'S FIRST EXPEDITED REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST NO. 10 FILED DECEMBER 28, 1998, IN DOCKET 981052-TP

#### Explanation and Location of Proprietary Information

The subject proprietary information is located on a CD-ROM. The proprietary information will be located in the spreadsheet file OSSE1FL.XLS.

The proprietary information in this spreadsheet is located in the columns marked 1996, 1997, 1998, 1999, 2000, 2001, A through F and the Total column. This information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. 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.