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Legal Department

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Tallahassee, Florida 32301  
(305) 347-5561

RECORDS AND  
REPORTING

ORIGINAL

February 4, 2000

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. 991267-TP (Global NAPS Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's First Set of Discovery (Interrogatory Nos. 2, 3, 4, and 5, and Request for Production No. 1), 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.

Sincerely,

*Michael P. Goggin*  
Michael P. Goggin (sw)

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 01616-00. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

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FPSC-RECORDS/REPORTING

*Confidential*  
DOCUMENT NUMBER-DATE

01616 FEB-4 8

FPSC-RECORDS/REPORTING

*Request*  
DOCUMENT NUMBER-DATE

01615 FEB-4 8

FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: ) Docket No. 991267-TP  
 )  
 Complaint of Global NAPs, Inc., against )  
 BellSouth Telecommunications, Inc. for )  
 Enforcement of Section VI(B) of its )  
 Interconnection Agreement with BellSouth )  
 Telecommunications, Inc. and Request for Relief )  
 \_\_\_\_\_ ) Filed: February 4, 2000

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

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, *Florida Administrative Code*, hereby files this Request for Specified Confidential Classification, and states:

1. On December 10, 1999, the Staff of the Florida Public Service Commission ("Staff") served its First Set of Interrogatories and Request for Production of Documents to BellSouth. On December 20, 1999, BellSouth filed its General and Specific Objections to that discovery and on January 14, 2000, BellSouth served its Responses and Objections to that discovery along with a Notice of Intent.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's responses to Interrogatory Nos. 2, 3, 4, and 5 and Request for Production No. 1 includes customer proprietary information and business proprietary information that could cause competitive harm to BellSouth and is clearly confidential and proprietary under Florida Statutes, Section 364.24 and Section 364.183.

3. In its Notice of Intent filed on January 14, 2000, BellSouth included Interrogatory No. 10 stating that it contained confidential and proprietary customer specific information. BellSouth is hereby withdrawing its request for Interrogatory No. 10.

4. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

5. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.

6. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents including those portions that are confidential and proprietary.

7. The information contained in BellSouth's response to Interrogatory Nos. 2, 3, 4, and 5 and Request for Production No. 1 includes information containing, among other things, customer proprietary information and business proprietary information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would provide competitors with an unfair advantage in future negotiations. This same information on competitors is not available to BellSouth. The information discussed in this Request for Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as customer proprietary information and proprietary, confidential business information pursuant to Section 364.24 and Section 364.183(3)(e),

Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

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 Request was filed today with the Division of Records and Reporting, and a copy was served on the Parties.

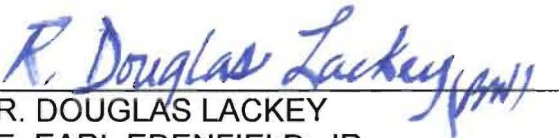
WHEREFORE, based on the foregoing, BellSouth respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 4th day of February, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.



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## ATTACHMENT A

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 991267-TP  
Request for Confidential Classification  
Page 1 of 2  
2/4/00**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO STAFF'S FIRST SET OF DISCOVERY (INTERROGATORY  
NOS. 2, 3, 4, AND 5 AND REQUEST FOR PRODUCTION NO. 1) FILED  
JANUARY 14, 2000, IN FLORIDA DOCKET NO. 991267-TP**

### **Explanation of Proprietary Information**

1. This information is proprietary to BellSouth and includes information containing customer proprietary and business proprietary information. The Commission has always zealously protected customer proprietary and business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

**CERTIFICATE OF SERVICE**  
**Docket No. 991267-TP**

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

U.S. Mail this 4th day of February, 2000 to the following:

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Commission  
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