## RECEIVED-FPSC

Legal Department

Bennett L. Ross General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0793 00 JUN 20 PM 4: 25

RECORDS AND REPORTING

June 20, 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. 990649-TP (UNEs)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth's Telecommunications, Inc.'s Request for Specified Confidential Classification, which we ask that you file 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.

Sincerely,

Bennett L. Ross

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

This confidentiality request was filed by or for a "telco" for DN (2)508-00. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

FPSC-BUREAU OF RECORDS

(X-ref. 0659 | -00)
DOCUMENT NUMBER-DATE

07507 JUN 208

FPSC-RECORDS/REPORTING

## CERTIFICATE OF SERVICE Docket No. 990649-TP

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

## Federal Express this 20th day of June, 2000 to the following:

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Bennett L. Ross

(+) Signed Protective Agreement

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSIONAL

n re: Investigation Into	)	
Pricing of Unbundled Network	)	Docket No. 990649-TP
Elements	)	
	ý	Filed: June 20, 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 May 30, 2000, BellSouth Telecommunications, Inc. filed its Response to Staff's Fifth Request for Production of Documents. Some of the information responsive to Production Request No. 16 is confidential and proprietary. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification.
- 2. BellSouth hereby files this Request for Specified Confidential Classification because some of the information contained in its Response to Staff's Production Request No. 16 is confidential and proprietary. It includes vendor specific pricing that could cause competitive harm to BellSouth and vendor proprietary information, which is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rules 25-22.006, Florida Administrative Code.

DOCUMENT NUMBER-DATE
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- 3. 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.
- 4. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.
- 5. 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.
- 6. The information contained in the cost studies includes confidential business information, which is considered proprietary. 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 and would unduly prejudice BellSouth's vendors. 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 confidential business information pursuant to Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.
- 7. 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.
- 8. 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 20<sup>th</sup> day of June, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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#### ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 990649-TP Request for Confidential Classification Page 1 of 3 6/20/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 16) FILED MAY 30, 2000 IN FLORIDA DOCKET NO. 990649-TP

#### **Explanation of Proprietary Information**

- 1. This information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
- 2. This information is proprietary information of a vendor. Vendors would be reluctant to provide this information to BellSouth so that BellSouth can begin its network and marketing plans if a vendor knew this information would be made available to its competitors. Thus, public disclosure would impair BellSouth's ability to contract for goods and/or services and is therefore proprietary under Section 364.183, Florida Statutes.

#### ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 990649-TP Request for Confidential Classification Page 2 of 3 6/20/00

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 16) FILED MAY 30, 2000 IN FLORIDA DOCKET NO. 990649-TP

#### STAFF'SPOD NO. 16

#### AT&T POD NO. 6

4 of 7         Column e         1           Column f         1           Column g         1           5 of 7         Column f         1           Column g         1           7 of 7         Column Material         1           Column Discount Rate         1           Column E & I         1           Column Total         1           Column Capacity per CC         1           Column \$/Unit         1	Page No.	Column	Reason
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#### AT&T POD 14e

Lucent Engineering	Entire Document	
Information Document	Pages 1-82	2

### **ATTACHMENT A**

BellSouth Telecommunications, Inc. FPSC Docket No. 990649-TP Request for Confidential Classification Page 3 of 3 6/20/00

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 16) FILED MAY 30, 2000 IN FLORIDA DOCKET NO. 990649-TP

#### AT&T POD 14f

Lucent Technologies Call Capacity Wksht	Entire Document Pages 1-15	2
AT&T POD 14h		
Process Capacity	Entire Document	2
AT&T POD 14i		
SST-U Input Memo Process Capacity Memo Assumption Table	Page 1 of 3 Page 2 of 3 Page 3 of 3	2 2 2
AT&T POD 14m		
Average Wktm Memo Facet Runs	Page 1 Page 3-30	2 2