LAW OFFICES

# MESSER, CAPARELLO & SELF

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701
POST OFFICE BOX 1876

TALLAHASSEE, FLORIDA 32302-1876
TELEPHONE: (850) 222-0720
TELECOPIER: (850) 224-4359
INTERNET: www.lawfla.com
July 17, 2000



#### BY HAND DELIVERY

Ms. Blanca Bayó, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

RE: Docket No. 990649-TP

AT&T's Claim for Confidential Treatment, Hearing Exhibit 31

Dear Ms. Bayó:

AT&T Communications of the Southern States, ("AT&T"), pursuant to Section 364.183(1), Florida Statutes, hereby claims that certain information provided to BellSouth Telecommunications, Inc. ("BellSouth") in response BellSouth's First Set of Interrogatories, Numbers 7, 10, 13, 19, 22, and 25, and BellSouth's First Request for Production of Documents, Numbers 1 and 2, which have been identified in the record during the July 17, 2000, Phase I hearing as Hearing Exhibit 31, contain confidential and proprietary business information that should be held exempt from public disclosure. Pursuant to Rule 25-22.0006(5), Florida Administrative Code, in the attached envelope identified as Exhibit "A" is one paper copy of AT&T's information with the confidential information highlighted and attached as Exhibit "B" are two paper copies of AT&T's information with the confidential information redacted.

A copy of the information contained in Hearing Exhibit 31 has not previously been filed with the Commission, as these materials were first requested by BellSouth pursuant to discovery in this docket and, prior to today, they were provided only to BellSouth. However, during the hearing this morning, an unredacted copy of AT&T's information was provided to the Commissioners, Staff, and Court Reporter and identified as Hearing Exhibit 31. Please note that while Hearing Exhibit 31, as distributed by BellSouth at the Commission this morning, contains a cover letter from AT&T's counsel Mr. Lamoureux indicating that the information is proprietary, and there are notations at both the top and bottom of each subsequent page indicating that the information is proprietary, these copies did not have the confidential information highlighted. Nonetheless, these copies of Hearing

RECEIVED & FILED

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DNO 30 -00. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

OCUMENT HUMBER-DATE

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Blanca Bayo July 17, 2000 Page 2

Exhibit 31 distributed at the hearing should also be treated as confidential pursuant to this claim for confidential treatment.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self

Coursel for AT&T Communications

of the Southern States

FRS/amb Enclosures

cc: J

Jim Lamoureux, Esq.

Ms. Rhonda Merritt

Parties of Record (without Exhibit "A")

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of AT&T Communications of the Southern States, Inc.'s Claim for Confidential Treatment, Hearing Exhibit 31 in Docket No. 990649-TP has been furnished by Hand Delivery (\*) and/or U.S. Mail to the following parties of record this 17th day of July, 2000:

Donna M. Clemons, Esq.\*
Division of Legal Services
Room 370, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White\*
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Mark E. Buechele
Supra Telecommunications & Information
Systems, Inc.
Koger Center-Ellis Building, Suite 200
1311 Executive Center Drive
Tallahassee, FL 32301-5027

Mr. Scott Sappersteinn Intermedia Communications, Inc. 3625 Queen Palm Drive Tampa, FL 33619-1309

Angela Green, Esq.
Florida Public Telecommunications Association
125 S. Gadsden St., Suite 200
Tallahassee, FL 32301

Patrick Wiggins, Esq. Charles Pellegrini, Esq. Wiggins and Villacorta, P.A. P.O. Drawer 1657 Tallahassee, FL 32302

Catherine Boone, Esq.
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328

Kenneth A. Hoffman, Esq. John R. Ellis, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P.O. Box 551 Tallahassee, FL 32302 Marsha Rule, Esq.
AT&T
101 N. Monroe St., Suite 700
Tallahassee, FL 32301

Christopher Goodpastor, Esq. Covad Communications Co. 9600 Great Hills Trail, Suite 150W Austin, TX 78759

Charles A. Hudak, Esq.
Jeremy D. Marcus, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravina Drive, Suite 1450
Atlanta, GA 30346-2131

Monica M. Barone Sprint Communications Company Limited Partnership Mailstop GAATLN0802 3100 Cumberland Circle Atlanta, GA 30339

Charles J. Rehwinkel Sprint-Florida, Incorporated MC FLTHO0107 P.O. Box 2214 Tallahassee, FL 32399-2214

Richard D. Melson Gabriel E. Nieto Hopping Green Sams & Smith, P.A. P.O. Box 6526 Tallahassee, FL 32314

Vicki Kaufman, Esq. Joe McGlothlin, Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 S. Gadsden Street Tallahassee, FL. 32301

Jeremy Marcus Kristin Smith Blumenfeld & Cohen 1625 Massachusetts Ave., NW, Suite 300 Washington, DC 20036 Peter M. Dunbar, Esq.
Marc W. Dunbar, Esq.
Pennington, Moore, Wilkinson & Dunbar, P.A.
P.O. Box 10095
Tallahassee, FL 32302

Carolyn Marek V.P. of Regulatory Affairs Southeast Region Time Warner Communications 233 Bramerton Court Franklin, TN 37069

Michael A. Gross
Vice President, Regulatory Affairs
& Regulatory Counsel
Florida Telecommunications Association, Inc.
310 North Monroe St.
Tallahassee, FL 32301

Kimberly Caswell GTE Florida Incorporated Post Office Box 110, FLTC0007 Tampa, FL. 33601-0110

ACI Corp. 7337 S. Revere Parkway Englewood, CO 80112

Terry Monroe CompTel 1900 M Street, NW, Suite 800 Washington, DC 20036

Telecommunications Resellers Association Andrew Isar P.O. Box 2461 Gig Harbor, WA 98335-4461

Time Warner AxS of Florida, L.P. d/b/a Time Warner Telecom 2301 Lucien Way, Suite 300 Maitland, FL 32751

Ms. Susan Huther MGC Communications, Inc. 3301 North Buffalo Drive Las Vegas, NV 89129

Laura Gallagher, Esq. 101 E. College Avenue, Suite 302 Tallahassee, FL 32301 James P. Campbell MediaOne 7800 Belfort Parkway, Suite 250 Jacksonville, FL 32256

Mr. Brian Sulmonetti MCI WorldCom, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328

Donna McNulty MCI WorldCom The Atrium Building, Suite 105 325 John Knox Road Tallahassee, FL 32303

Eric Branfman Morton J. Posner Swidler Berlin Shereff Firedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 2007-5116

John McLaughlin KMC Telecom, Inc. Suite 170 3025 Breckinridge Boulevard Duluth, GA 30096

Bettye Willis ALLTEL Communications Services, Inc. One Allied Drive Little Road, AR 72203-2177

J. Jeffry Wahlen Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302

BlueStar Networks, Inc. Norton Cutler/Michael Bressman 401 Church Street, 24th Floor Nashville, TN 37210

Broadslate Networks of Florida, Inc. John Spilman 675 Peter Jefferson Parkway, Suite 310 Charlottesville, VA 22911

Cleartel Communications, Inc. Hope G. Colantonio 1255 22nd Street, N.W., 6th Floor Washington, DC 20037 Kelley Law Firm Jonathan Canis/Michael Hazzard 1200 19th St. NW, Fifth Floor Washington, DC 20036

Network Access Solutions Corporation 100 Carpenter Drive, Suite 206 Sterling, VA 20164

Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004

Brent E. McMahan Vice President-Regulatory and Government Affairs Network Telephone Corporation 815 South Palafox Street Pensacola, FL 32501

Z-Tel Communications, Inc. George S. Ford 601 S. Harbour Island Blvd. Tampa FL 33602-5706

Floyd R. Self



EXHIBIT "B" --- REDACTED COPY

Jim Lamoureux
Senior Attorney
Law and Government Affairs
Southern Region
]lamoureux@att.com

Promenade 1 1200 Peachtree Street N.E. Atlanta, GA 30309 404 810 4196 FAX: 404 877 7648

July 14, 2000

#### BY FACSIMILE

Bennett L. Ross General Attorney BellSouth Telecommunications, Inc. Legal Department 675 West Peachtree Street, N.E. Atlanta, Georgia 30375-0001

Re: Florida Docket No. 990649-TP

#### Dear Bennett:

In response to your July 10, 2000, letter, AT&T stands by its objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents. Nonetheless, in the spirit of cooperation, AT&T accepts your proposed compromise. Accordingly, attached are AT&T's 1998 and 1999 depreciation lives for more than 100 categories that AT&T uses in development of its annual report. Please note that this information is proprietary and should be treated as such pursuant to the Protective Agreement entered into by BellSouth and AT&T in this proceeding.

Nothing in this acceptance of BellSouth's proposal should be construed as acceptance by AT&T that the information attached is relevant in any way to this proceeding. Nor should it constitute any sort of waiver of any objections AT&T might raise as to the use or admissibility of this information in the proceeding. AT&T accepts BellSouth's offer only in a good-faith effort to avoid contentious discovery disputes in this proceeding.

Please call if you have questions.

Jim Lámoureux

Sincerel

4048105901

T-489 P.06/08 Job-937

Produced pursuant to Protective Agreement in Docket No. 990649

### AT&T NETWORK DEPRECIATION RATES 1998 vs. 1999

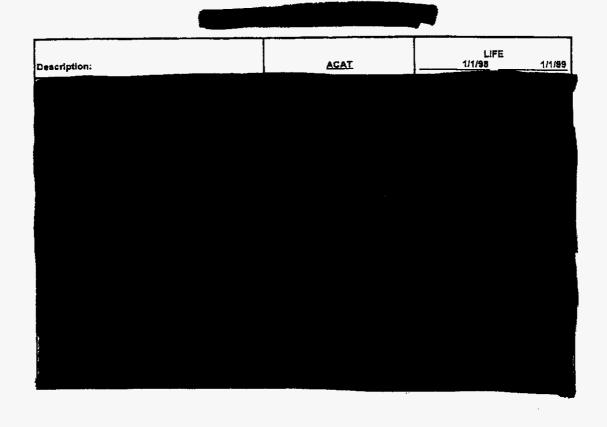
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1/1/98
1/1/99

Produced pursuant to Protective Agreement in Docket No. 990849

T-489 P.07/08 Job-937

# AT&T NETWORK DEPRECIATION RATES

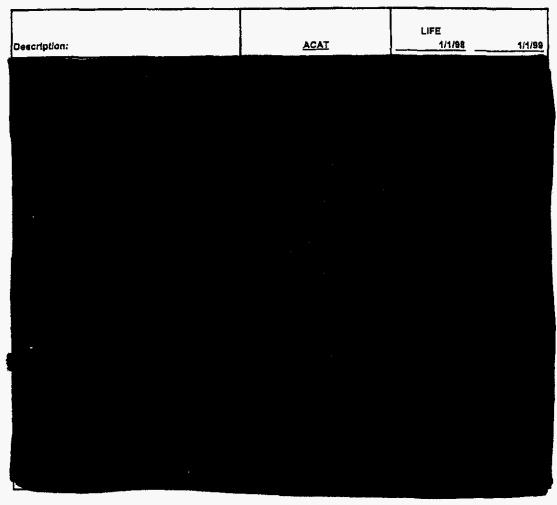
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T-489 P.08/08 Job-937

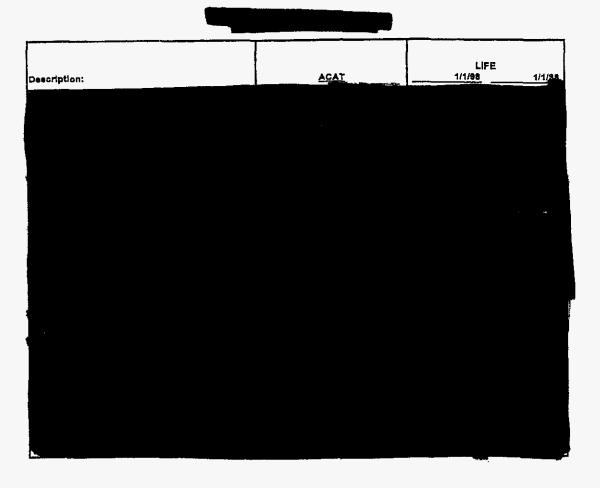
Produced pursuant to Protective Agreement in Docket No. 990649





T-489 P.03/08 Job-937

JUL-14-00 15:51 From:AT&T
Produced pursuant to Protective Agreement in Docket No. 990849



T-489 P.04/08 Job-937

\* JUL-14-00 15:52 From:AT&T

CINCOLLANI

Produced pursuant to Protective Agreement in Docket No. 990849

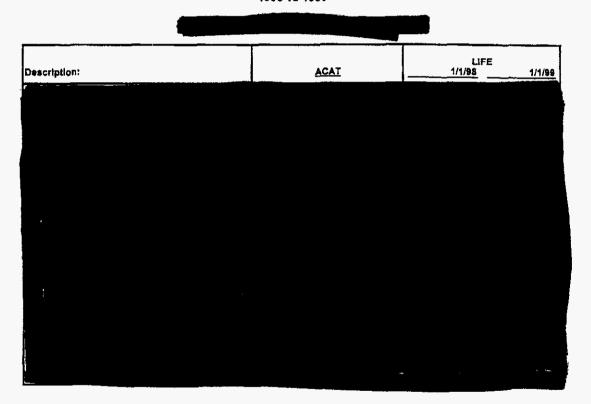
# AT&T NETWORK DEPRECIATION RATES 1998 vs 1999

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Produced pursuant to Protective Agreement in Docket No. 990549



T-489 P.02/08 Job-937



EXHIBIT "B" -- REDACTED COPY

Jim Lamoureux Senior Attorney Law and Government Affairs Southern Region jlamoureux@att.com Promenade 1 1200 Peachtree Street N.E. Allanta, GA 30309 404 810 4196 FAX: 404 877 7648

July 14, 2000

#### BY FACSIMILE

Bennett L. Ross General Attorney BellSouth Telecommunications, Inc. Legal Department 675 West Peachtree Street, N.E. Atlanta, Georgia 30375-0001

Re: Florida Docket No. 990649-TP

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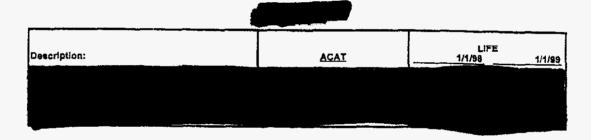
Please call if you have questions.

Jim Lamoureux

Sincerely

T-489 P.06/08 Job-937

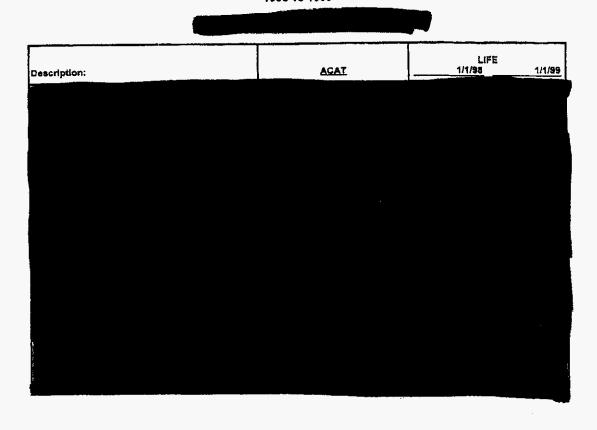
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Produced pursuant to Protective Agreement in Docket No. 990649



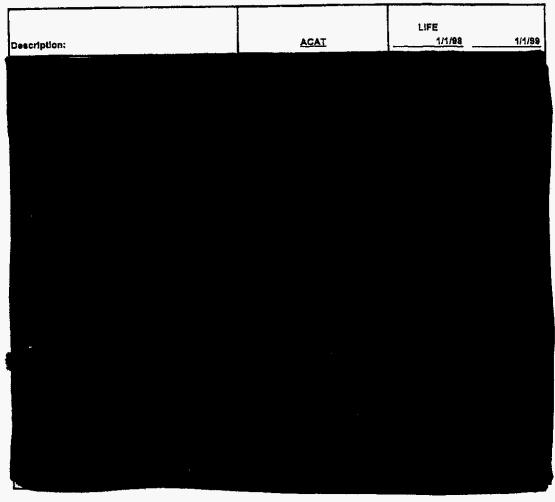
Produced pursuant to Protective Agreement in Docket No. 990849

# AT&T NETWORK DEPRECIATION RATES

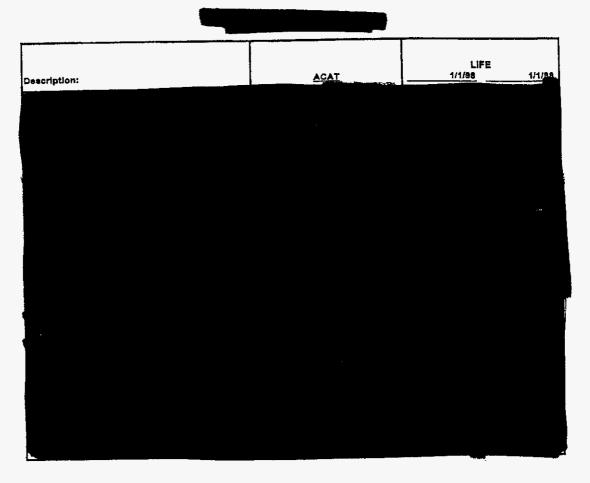
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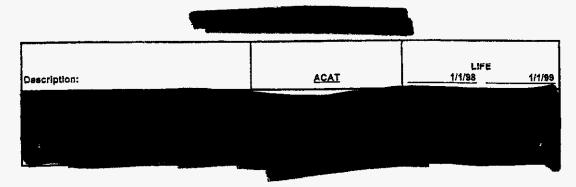
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T-489 P.05/08 Job-937

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