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September 10, 2001

Mrs. Blanca S. Bayó Director, Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: 960786-TL (Section 271)

Dear Ms. Bayó:

Enclosed please find the original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification of its Unbundled Network Element (UNE) Cost Studies filed as Revised Exhibit DDC-1 to the Surrebuttal Testimony of Daonne Caldwell and a Request for Confidential Classification of the Surrebuttal Testimony of Ken L. Ainsworth filed on August 20, 2001 which we ask that you file in the above-referenced docket.

A copy 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 by Federal Express and Hand Delivery as shown on the attached Certificate of Service.

Sincerely,

Lisa S. Foshee

Enclosures

cc: All Parties of Record Marshall M. Criser III Fred J. McCallum Nancy B. White

DOCUMENT NUMBER - DATE

11302 SEP 10 =

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE DOCKET NO. 960786-TL

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

Hand Delivery (*) and Federal Express this 10th day of September, 2001 to the

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Lisa S. Foshee / NA

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of)	
BellSouth Telecommunications,)	Docket No. 960786-TL
Inc.'s entry into interLATA)	
services pursuant to Section 271)	Filed: September 10, 2001
of the Federal Telecommunications)	·
Act of 1996)	
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BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

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

- 1. On August 20, 2001, BellSouth filed Testimony of D. Daonne
 Caldwell along with a Notice of Intent to Request Confidential Classification for
 information contained in Revised Exhibit No. DDC-1 to her surrebuttal testimony.
 The information contained in the exhibit includes vendor-specific pricing
 information, confidential business information and customer proprietary
 information that is considered proprietary to BellSouth.
- 2. On August 20, 2001, BellSouth filed Surrebuttal Testimony of Ken L. Ainsworth along with a Notice of Intent to Request Confidential Classification for information contained in his testimony. The information contained in the testimony includes vendor-specific pricing information, confidential business

information and customer proprietary information that is considered proprietary to BellSouth.

- 3. BellSouth hereby files this Request for Specified Confidential
 Classification because the information contained in the revised exhibit and
 surrebuttal testimony of D. Daonne Caldwell and the surrebuttal testimony of Ken
 L. Ainsworth includes vendor-specific pricing information, confidential business
 information and customer proprietary information that could cause competitive
 harm to BellSouth and is clearly confidential and proprietary under Florida
 Statutes, Sections 364.183 and 364.24.
- 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 Revised Exhibit No. DDC-1 includes vendor-specific pricing information, confidential business information and customer 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 confidential business information and customer proprietary 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. The information contained in Surrebuttal Testimony of Ken L. Ainsworth includes vendor-specific pricing information, confidential business information and customer 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 confidential business information and customer proprietary 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.
- 9. 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.
- 10. 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 10th day of September 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-TL. Request for Confidential Classification Page 1 of 2 9/10/01

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S UNBUNDLED NETWORK ELEMENT (UNE) COST STUDIES FILED AS REVISED EXHIBIT DDC-1 TO THE SURREBUTTAL TESTIMONY OFDAONNE CALDWELL, AND A REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE SURREBUTAL TESTIMONY OF KEN L. AINSWORTH FILED ON AUGUST 20, 2001, IN FLORIDA DOCKET NO. 960786-TL.

Explanation of Proprietary Information

- This information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would harm BellSouth's business operations because it would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statues, such information is classified as proprietary, confidential business information which is exempt from Section 119.07 (1) and Section 24(a), Art.1 of the State Constitution.
- 2. The information is proprietary to BellSouth and includes date containing customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. Pursuant to Section 364.183, Florida Statues, such information is classified as proprietary, confidential business information which is exempt from Section 119.07 (1) and Section 24(a), Art.1 of the State Constitution.

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-TL Request for Confidential Classification Page 2 of 2 9/10/01

LOCATION

COMPACT DISK

PROPRIETARY COST STUDY FILING CD

FILE NAME	<u>BASIS</u>
MDF_FUND.xls	1
Flphycol.xls	1
FLPCpot.xls	1
Flpckey.xls	1
FLCollRT.xls	1
FLLineSh.xls	1
Fladjphc.xis	1
FLAsmbPT.xls	1
Ds1_calc.xls	1

TESTIMONY	BASIS
PAGE 9, LINE16	2
PAGE 10, LINE 7	2