

MARY K. KEYER
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0729

November 13, 1998

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

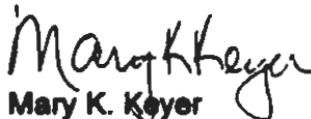
Re: **Docket No. 980733-TL**
Special Project No. 980000A-SP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth 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 party shown on the attached Certificate of Service.

Sincerely,


Mary K. Keyer

Enclosures

cc: All parties of record
A. M. Lombardo
N. B. White
William J. Ellenberg II (w/o enclosure)

DOCUMENT NUMBER-DATE
12744 NOV 13 8
FPSC-RECORDS/REPORTING

4. Appended hereto as "Attachment B" are two copies of the requested documents with the confidential information deleted.

5. Appended hereto as "Attachment C" is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

7. The information provided contains actual unit cost information for discrete cost elements for the services under study. These costs reflect BellSouth's Total Service Long Run Incremental Cost of providing these services on a going-forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes, and is exempt from the Open Records Act.

8. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private. This information has not been generally disclosed.

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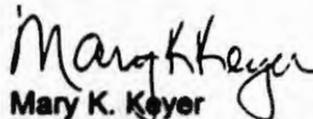
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fair and Reasonable Residential)
Basic Local Telecommunications Rates)

Special Project No. 980000A-SP

Dated: November 13, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Specified Confidential Classification for the portions of the Attorney General's Final Comments which are confidential to BellSouth.

1. In a letter dated October 28, 1998, the Attorney General informed BellSouth that it intends to use confidential information belonging to BellSouth in its Final Comments which are due on November 13, 1998, in the captioned Special Project. This information is information which was produced by BellSouth in response to the Division of Communications' Data Requests 1(b), (d), (e), (h), (j), 2(b), 3(b), and 4(b).

2. BellSouth is filing this Request for Confidential Classification because the information which the Attorney General has informed BellSouth he plans to use in his comments is clearly confidential and proprietary and, therefore, entitled to confidential classification pursuant to Sections 119.07(2)(r) and 364.183(3)(a) and (e), Florida Statutes.

3. BellSouth has appended to this Request for Confidential Classification as "Attachment A" a list of the location in the response of the information designated by BellSouth as confidential.

4. Appended hereto as "Attachment B" are two copies of the requested documents with the confidential information deleted.

5. Appended hereto as "Attachment C" is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

7. The information provided contains actual unit cost information for discrete cost elements for the services under study. These costs reflect BellSouth's Total Service Long Run Incremental Cost of providing these services on a going-forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes, and is exempt from the Open Records Act.

8. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private. This information has not been generally disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an Order declaring the information described above and contained in the indicated portions of the Final Comments to be confidential, proprietary business information, and, thus, not subject to public disclosure.

Respectfully submitted this 13th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White MKK

NANCY B. WHITE

c/o Nancy H. Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

Mary K. Keyer

WILLIAM J. ELLENBERG

MARY K. KEYER

675 W. Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0711

COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.

CERTIFICATE OF SERVICE
Docket No. 980733-TP
Special Project No. 980000A-SP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 13th day of November, 1998, to the following:

Division of Communications
Waiter D'Haeseleer
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



Mary K. Keyer

ATTACHMENT A

Undocketed Special Project 980000A-SP Florida Public Service Commission Division of Communications

Item 1(e)

November 13, 1998

- A. This information contains actual unit cost information for discrete cost elements for the services under study. These costs reflect BellSouth's Total Service Long Run Incremental Cost of providing these services on a going-forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

ITEM 1(e)

PAGE NO.	ITEM	BASIS FOR REQUEST
Attachment 2, Page 6	Unit Cost, Unit Contribution, Inservice Quantity, Total Cost, Total Contribution, Percent Contribution	A

ATTACHMENT A

**Undocketed Special Project 980000A-SP
Florida Public Service Commission
Division of Communications**

Item 1(b), (d), (h), (j)

Item 2(b)

Item 3(b)

Item 4(b)

November 13, 1998

- A. This information contains actual unit cost information for discrete cost elements for the services under study. These costs reflect BellSouth's Total Service Long Run Incremental Cost of providing these services on a going-forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes, and is exempt from the Open Records Act.

<u>PAGE NO.</u>	<u>ITEM</u>	<u>BASIS FOR REQUEST</u>
Page 5	Rate Grps 1 - 12 all Monthly Cost-Loop, NTS & Usage	A
Page 10	Cost, Minutes & Calls per Month	A