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92 OCT -8 PM 4:29

RECORDS AND
REPORTING

October 8, 1998

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

RE: Docket No. 980696-TP

Dear Mrs. Bayo:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s, Request for Confidential Classification. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,


Mary K. Keyer

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg (w/o enclosures)

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

X-101 10 262-98
DOCUMENT NUMBER-DATE
11103 OCT-8 8
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of the Cost)
of Basic Local Telecommunications) Docket No.: 980696-TP
Service, pursuant to Section 364.025,)
Florida Statutes)
_____) Dated: October 8, 1998

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

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

1. On September 17, 1998, BellSouth filed its response to Staff's Third Request for Production of Documents. At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification for the subject information. BellSouth notes that some of this information is the same information that was produced in response to Staff's First Request for Production of Documents, for which a Notice of Intent and Request for Confidential Classification have already been filed.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing of the location of the information designated by BellSouth as proprietary.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

3. Appended hereto as Attachment B are two copies of the subject exhibit with the proprietary information deleted.

4. Appended hereto as Attachment C is a sealed envelope containing one copy of the exhibit, including the material which is proprietary.

5. The subject exhibit contains information related to prices that BellSouth has negotiated with specific vendors. Specifically, the subject information entails the prices, frequently discounted, that BellSouth receives on particular items of equipment. If this information were publicly disclosed, it would impair BellSouth's ability to obtain favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to Fla. Stat.

§ 164.183(3)(d).

6. Other information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Fla. Stat. § 364.183(3)(e).

7. Further, some of the subject information includes practices and procedures developed by BellSouth. Those practices and procedures are not publicly disclosed, and were developed by BellSouth only by expending a great deal of time and money. Accordingly, this information constitutes trade secrets entitled to confidential classification pursuant to Fla. Stat. § 364.183(3)(a).

8. Finally, some of the information contains detailed financial and strategic information and is considered proprietary to BellSouth. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. This same information on competitors is not available to BellSouth or its affiliated companies. 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 Fla. Stat. § 384.183(3)(e), and is exempt from the Open Records Act.

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 has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

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

Respectfully submitted this 8th day of October, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White mxx

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NANCY B. WHITE

c/o Nancy Sims

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**CERTIFICATE OF SERVICE
DOCKET NO. 980696-TP (HB4785)**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express and *Hand Delivery this 8th day of October, 1998 to the following:

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Mary K. Keyer

(+) Protective Agreements

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 980696-TP
Staff's 3rd Document Request
Request for Confidential Classification
Page 1
10/3/98

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED IN RESPONSE TO FPSC STAFF'S 3rd REQUEST FOR DOCUMENTS ON AUGUST 28, 1998 IN DOCKET 980696-TP

Explanation of Proprietary Information

1. The subject exhibit contains information related to prices that BellSouth has negotiated with specific vendors. Specifically, the subject information entails the prices, frequently discounted, that BellSouth receives on particular items of equipment. If this information were publicly disclosed, it would impair BellSouth's ability to obtain favorable discounts in the future. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 164.183(3)(d).
2. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to F.S. § 364.183(3)(e).
3. The subject information includes practices and procedures developed by BellSouth. Those practices and procedures are not publicly disclosed, and were developed by BellSouth only by expending a great deal of time and money. Accordingly, this information constitutes trade secrets entitled to confidential classification pursuant to F.S. § 364.183(3)(a).
4. This information contains detailed financial and strategic information and is considered proprietary to BellSouth. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. This same information on competitors is not available to BellSouth or its affiliated Companies. 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.

POD NO. 15

RL:97-06-014BT

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
1	1-15	1,2
2	Entire Page	2,3
3	1-13	2,3
6	1-20	2,3

RL:97-03-012BT

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
1	4,5,10	1
4-8	Entire Pages	1,2,3
9	1-31	2
10	12-33	2,3
12	1-38	2,3

RL:96-09-026BT

<u>PAGE NO.</u>	<u>LINE NOS./COL. NO.</u>	<u>REASON</u>
1	1-17	2,3
4-38	Entire Pages	2,3
40-59	Entire Pages	2,3

POD NO. 22

Active PIDS

<u>Page No.</u>	<u>Column</u>
1-36	GTE Stk Price Quantity
1-20	GTE Stk Price Quantity
1-11	GTE Stk Price Quantity

Copper Cable - By Field Reporting Code

<u>Page No.</u>	<u>Lines</u>	<u>Column</u>
1-2	3-13 16-30 35-45 48-52 57-68 71-78 81-91 94-97 100-105 108-122 125-130 133-144 147-152 155-159 164-170 173-183	GTE Price Per Ft. Quantity

POD NO. 22

1998 Copper Cable Table

<u>Page No.</u>	<u>Lines</u>	<u>Column</u>
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		Quantity
		Price Per Ft.
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	10-14	
	17-18	
	22-27	
	29-33	
	36-37, 41	
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BellSouth Telecommunications, Inc.
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POD NO. 22

1998 Fiber Cable Table

<u>Page No.</u>	<u>Lines</u>	<u>Column</u>
1-3		GTE Stk
		Quantity
		Price Per Ft.
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	30-55	
	58-81	
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GTE Discount

<u>Page No.</u>	<u>Lines</u>	<u>Column</u>
1		Annual Discount
		Cumulative Discount Effect
		Material Discount

POD NO. 49

<u>Page No.</u>	<u>Location</u>	<u>Reason</u>
Page 1	Actuals 1996 Column Actuals 1997 Column Budget 1998 Column Plans 1999 Column Plans 2000 Column	4
Page 2	1998 Column	4