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RECORDS AND  
REPORTING

September 6, 2000

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

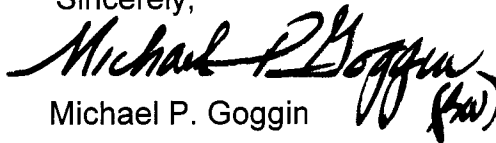
**Re: Docket No. 990649-TP (UNE Docket)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s *Supplemental* Request for Specified Confidential Classification for AT&T Communications of the Southern States, Inc.'s Rebuttal Testimony filed on July 31, 2000, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,

  
Michael P. Goggin

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

This confidentiality request was filed by or for a "telco" for DN 11042-00. 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.

(X-ref. 09159-00)  
09163-00)

DOCUMENT NUMBER-DATE

11041 SEP-68

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

Electronic Mail and Federal Express this 6th day of September, 2000 to the following:

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**(+) Signed Protective Agreement**

219337

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No.: 990649-TP  
network element )  
\_\_\_\_\_ ) Filed: September 5, 2000

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

BellSouth Telecommunications, Inc., ("BellSouth") pursuant to Rule 25-22.006, *Florida Administrative Code*, hereby files this *Supplemental Request for Specified Confidential Classification*, and states:

1. On July 31, 2000, AT&T Communications of the Southern States, Inc. ("AT&T") filed the Rebuttal Testimony of Witnesses' Catherine E. Pitts and John C. Donovan/Brian F. Pitkin, along with a Notice of Intent to Request Specified Confidential Classification in the captioned docket. Included in these testimonies was cost information proprietary to BellSouth.
2. BellSouth has filed Requests for Specified Confidential Classification ("RCCs") for all of the confidential and proprietary BellSouth information included in AT&T's July 31, 2000 filings. In particular, BellSouth filed the following RCC's with respect to this information:

05/08/00	Request for Specified Confidential Classification
05/22/00	Request for Specified Confidential Classification
06/02/00	Request for Specified Confidential Classification
06/20/00	Request for Specified Confidential Classification
07/18/00	Request for Specified Confidential Classification

Accordingly, the information identified in AT&T's July 31, 2000 filings identified as BellSouth's confidential and proprietary information remains confidential and exempt from Section 119.07(1), Florida Statutes.

DOCUMENT NUMBER-DATE

11041 SEP-68

3. In an abundance of caution, however, BellSouth hereby files this *Supplemental Request for Specified Confidential Classification* regarding the confidential information contained in the Rebuttal Testimony of Catherine E. Pitts and John C. Donovan/Brian F. Pitkin, which includes cost information, vendor-specific pricing information, and competitive business 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 *Supplemental Request for Specified 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 *Supplemental Request for Specified Confidential Classification* contains two copies of the documents with the confidential information redacted.

6. Attachment "C" to BellSouth's *Supplemental Request for Specified 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 the Rebuttal Testimony of Catherine E. Pitts and John C. Donovan/Brian F. Pitkin, includes cost information, vendor-specific pricing information, and competitive business 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 is valuable and BellSouth strives to keep it secret. Therefore, such information should continue to 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. 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.

9. 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 5th day of September, 2000.

BELLSOUTH TELECOMMUNICATIONS, INC.

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## ATTACHMENT A

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 990649-TP**  
**Supplemental Request for Confidential Classification**  
**Page 1 of 3**  
**9/6/00**

**SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH INFORMATION INCLUDED IN THE AT&T REBUTTAL  
TESTIMONY OF WITNESSES' CATHERINE E. PITTS AND JOHN C.  
DONOVAN/BRIAN F. PITKIN FILED JULY 31, 2000 IN FLORIDA DOCKET  
NO. 990649-TP**

### **Explanation of Proprietary Information**

1. This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements 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 access 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.
2. 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.
3. This information is derived from the Switching Cost Information System (SCIS) which is the property of Telcordia Technologies, Inc (Telcordia). Public disclosure of this information would violate BellSouth's agreement with Telcordia and would impair BellSouth's ability to contract for goods and/or services in the future. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
4. This information contains competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information which was developed at an expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as research and development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.

## ATTACHMENT A

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 990649-TP**  
**Supplemental Request for Confidential Classification**  
**Page 2 of 3**  
**9/6/00**

**SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH INFORMATION INCLUDED IN THE AT&T REBUTTAL  
TESTIMONY OF WITNESSES' CATHERINE E. PITTS AND JOHN C.  
DONOVAN/BRIAN F. PITKIN FILED JULY 31, 2000 IN FLORIDA DOCKET  
NO. 990649-TP**

**CATHERINE E. PITTS, JULY 31, 2000 REBUTTAL TESTIMONY**

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23	Footnote 25	1
26	14,15,18	1,4
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CEP-2, Pg 3 of 3	Entire Page	3
B000050	Column e,f,g	1,2
B000051	Column e,f	1,2
B000053	Material Column	1,2
	Discount Column	1,2
	E&I Column	1,2
	Total Column	1,2
	Capacity Column	1,2
	Unit Column	1,2

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 990649-TP  
Supplemental Request for Confidential Classification  
Page 3 of 3  
8/30/00**

**SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH INFORMATION INCLUDED IN THE AT&T REBUTTAL  
TESTIMONY OF WITNESSES' CATHERINE E. PITTS AND JOHN C.  
DONOVAN/BRIAN F. PITKIN FILED JULY 31, 2000 IN FLORIDA DOCKET  
NO. 990649-TP**

**CATHERINE E. PITTS, JULY 31, 2000 REBUTTAL TESTIMONY**

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	Material Column	1,2
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	E&I Column	1,2
	Total Column	1,2
	Capacity Column	1,2
	Unit Column	1,2
	Utilization Col	1,2
CEP-8	Util Invstmn Col	1,2
	Amount Column	1,2
	L12, L13, and L17	1,2

**JOHN C. DONOVAN/BRIAN F. PITKIN, JULY 31, 2000 REBUTTAL  
TESTIMONY**

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44	1-3	1,2
JCD/BFP-10 Pg 6	BellSouth Value Lines 335-339, Col C	1,2
Pg 7	BellSouth Value Lines 409-414, Col C	1,2