

ORIGINAL
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Legal Department

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October 25, 1996

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

RE: Docket No. ~~960833~~-TP; 960846-TP; 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification and Motion for Permanent Protective Order. 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,

Nancy B. White
Nancy B. White (NW)

Enclosures

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

[Handwritten signature]
EPSC

DOCUMENT NUMBER-DATE
1388 OCT 25 96
RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)
Communications of the Southern)
States, Inc., MCI) Docket No. 960833-TP
Telecommunications Corporation,)
MCI Metro Access Transmission)
Services, Inc., American) Docket No. 960846-TP
Communications Services, Inc.)
and American Communications)
Services of Jacksonville, Inc.) Docket No. 960916-TP
for arbitration of certain terms)
and conditions of a proposed)
agreement with BellSouth)
Telecommunications, Inc.)
concerning interconnection and) Filed: October 25, 1996
resale under the)
Telecommunications Act of 1996)
_____)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order for the Unbundled Loop Information (TELRIC) in the above captioned dockets.

1. BellSouth is filing its Request for Confidential Classification for the Unbundled Loop Information (TELRIC) filed on October 4, 1996 because it deems the information requested to be confidential and proprietary business information in that it reflects vendor specific prices and revenue and cost data. Since competitors who will offer local services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

DOCUMENT NUMBER-DATE

11388 OCT 25 88

FPSC-RECORDS/REPORTING

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

3. Appended hereto in an envelope designated as Attachment B is one copy of the response with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the response with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. This information contains revenue and cost data which reflects BellSouth's long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. 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. This information meets the statutory criteria, and should therefore be afforded confidential classification.

BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and 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 this information to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 25th day of October, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (as)

ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5555

R. Douglas Lackey (as)

R. DOUGLAS LACKEY

NANCY B. WHITE

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0710

CERTIFICATE OF SERVICE
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 25th day of October, 1996 to the following:

Staff Counsel
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

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Nancy B. White (ms)

CERTIFICATE OF SERVICE
DOCKET NO. 960833-TP
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 25th day of October, 1996 to the following:

Tracy Hatch
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Nancy B. White (SM)

ATTACHMENT A
Request for Confidential Classification
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ATTACHMENT A

FPSC DOCKETS 960833/846/916-TP

Unbundled Loops (TELRIC) filed 10/4/96

Explanation of Proprietary Information

A. This information contains costs which reflect BellSouth's long run incremental cost of providing service on a going forward basis. Public disclosure of this information would provide BellSouth's competitors with an advantage. The cost data is valuable to competitors and potential competitors in formulating plans for entry, pricing, marketing and overall business strategies. This same information on competitors is not available to BellSouth. In addition, this information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183 Florida Statutes.

LOCATION OF THE PROPRIETARY INFORMATION

<u>PAGE NO.</u>	<u>LINE/COL. NO</u>	<u>REASON</u>
Page 25	Col. C; Lines 25,28,31,34	A
26	Lines 5 & 8	A
30	Cols. M&N; Lines 7-11, 13-17, 19-23,25-29,31-35,37-41,43-46	A
31	Cols. M&N; Lines 6,8-12,14-18, 20-24,26-30,32-36,38-42,44-46	A
32	Cols. M&N; Lines 6,7,9-13,15-19, 21-25,27-31,33-37,39-43,45,46	A
33	Cols. M&N; Lines 6-8,10-14, 16-20,22-26,28-32,34-38, 40-44,46	A
34	Cols. M&N; Lines 6-20,25-29, 31-35,37-41,43,44	A
35	Cols. M&N; Lines 6-8,10-13	A
37	Line 11(no.)	A
40,42	Cols. D&F; H, Lines 108-144, 147	A
41	Cols. D&F; H, Lines 12-48,51	A

Attachment A
Dockets 960833/846/916-TP
Staff's 2nd Request
for Unbundled Loops Cost Study
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<u>PAGE NO.</u>	<u>LINE/COL. NO</u>	<u>REASON</u>
Page 51,53,55	Cols. C&D, Lines 3-9	A
52,54	Cols. A,B,D-G, Lines 7-30	A
56	Cols. A,B,D-G, Lines 8-28	A
65	Cols. D-I	A