

BENNETT L. ROSS
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December 22, 1997

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

RE: Docket Nos. 960833-TP/960846-TP/960757-TP
960916-TP and 971140-TP

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification, 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 on the parties shown on the attached Certificate of Service.

Sincerely,

Bennett L. Ross (KE)

Bennett L. Ross

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- RCH
- SEC
- WAS
- OTH

Enclosures

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

RECEIVED & FILED

X-ref 12622-97
DOCUMENT NUMBER-DATE

13082 DEC 22 5

FPSC-RECORDS/REPORTING

Mat...

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T)	Docket No. 960833-TP
Communications of the Southern)	
States, Inc., and MCI)	Docket No. 960846-TP
Telecommunications Corporation,)	
MCI Metro Access Transmission)	
Services, Inc., for arbitration)	
of certain terms and conditions)	
of a proposed agreement with)	
BellSouth Telecommunications,)	
Inc. concerning interconnection)	
and resale under the)	
Telecommunications Act of 1996)	
)	
In the matter of)	Docket No. 960757-TP
)	
MFS Communications Company, Inc.)	
)	
Petition for Arbitration Pursuant)	
to 47 U.S.C. § 252(b) of)	
Interconnection Rates, Terms, and)	
Conditions with)	
)	
BellSouth Telecommunications, Inc.)	
)	
In the Matter of)	Docket No. 960916-TP
Petition by American)	
Communications Services, Inc.)	
and American Communications)	
Services of Jacksonville, Inc.)	
for Arbitration with BellSouth)	
Telecommunications, Inc.)	
pursuant to the)	
Telecommunications Act of 1996)	
)	
)	
In re: Petition by MCI Metro Access)	Docket No. 971140-TP
Transmission Services, Inc., to Set)	
Non-Recurring Charges for)	
Combination of Network Elements)	
to Set Non-Recurring Charges for)	
Combination of Network Elements)	
with BellSouth Telecommunications, Inc.)	Filed: December 22, 1997
)	

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

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

1. On December 9, 1997, BellSouth filed revisions to Exhibit P-1 of the Direct Panel Testimony of D. Daonne Caldwell and William P. Zarakas along with a Notice of Intent to Request Confidential Classification for the subject information on this cost study Exhibit.

2. BellSouth is filing a Request for Confidential Classification for the subject information because the revisions to Exhibit P-1 contain confidential and proprietary business information.

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

4. Appended hereto as Attachment B is 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.

6. The requested cost study revisions contain information considered to be confidential and proprietary to BellSouth, and includes

information containing, among other things, cost, vendor specific and other company proprietary information. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

7. 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.

8. *The original of this Notice 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 22nd day of December, 1997.

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE
DOCKET NOS. 960833-TP/960846-TP/960757-TP/960916-TP/971140-TP

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

Federal Express this 22nd day of December, 1997 to the following:

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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Revised Direct Testimony of D. Caldwell
Request for Confidential Classification
Page 1
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DATA FILED AS ATTACHMENTS TO THE REVISED DIRECT TESTIMONY OF DAONNE CALDWELL ON DECEMBER 9, 1997 IN DOCKETS 960833-TP, 960846-TP, 960757-TP, 960916-TP AND 971140-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 prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. The second category of vendor specific information constituting a trade secret is that which is proprietary to Bellcore. Contained within the subject protected information is information from the SCIS (Switching Cost Information System) model developed by Bellcore. There is also information in the SNC (Switched Network Calculator) model of BellSouth that is derived from the SCIS. The SCIS is a model the Bellcore considers to be proprietary, and BellSouth is contractually bound by an agreement with Bellcore to treat it as such. This model incorporates information given to Bellcore by switch vendors, as well as programming algorithms developed by Bellcore to translate the switch vendor information into cost profiles for various applications. This computer model has been developed by Bellcore over the course of more than a decade at a cost of tens of millions of dollars. If any of this information was made publicly available, the value of Bellcore's model and the related services it provides would decrease dramatically. 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.

ATTACHMENT A

BellSouth Telecommunications, Inc.
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Revised Direct Testimony of D. Caldwell
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ITEM/LOCATION

Florida OSS Cost Study Input Worksheets
Proprietary Data

BASIS FOR REQUEST

ALL 1 and 2 above

Page 640.1	Columns 1997, 1998, 1999,	Lines. 4-55
Page 640.2	Columns 1996, 1997, 1998, 1999,	Lines 60-115
Page 640.3	Columns 1996, 1997, 1998, 1999	Lines 116 - 170
Page 640.4	Columns 1996, 1997, 1998, 1999	Lines 173-227
Page 640.5	Columns 1996, 1997, 1998, 1999	Lines 228 - 283
Page 640.6	Columns 1996, 1997, 1998, 1999	Lines 285 - 339
Page 640.7	Column 1996, Line 340 Columns 1997 - 1999,	Lines 344 - 377 Line 390
Page 640.8	Columns 1996, 1997, 1998	Lines 400 - 451
Page 640.9	Columns 1997, 1998, 1999	Lines 452 - 503
Page 640.15	Column 1997 - Total NR	Lines 8 - 63
Page 640.16	Column 1997 - Total NR	Lines 8 - 63
Page 640.16	Columns 1996, 1997, Total NR	Lines 66 -124
Page 640.17	Columns 1996, 1997, Total Nr	Lines 126 - 184 Lines 185-244
Page 640.18	Column Total NR,	Lines 249 - 304
Page 640.19	Column 1996, 1997, Total NR	Lines 305 - 364
Page 640.20	Column 1996, 1997, Total NR	Lines 366-419
Page 640.21	Column 1996, 1997, Total NR	Lines 425 - 453
Page 640.22	Column 1997, Total NR	

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
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<u>ITEM/LOCATION</u>	<u>BASIS FOR REQUEST</u>
Page 640.23	Columns 1997, 1998, 1999 Lines 6 - 48
	Columns 1997, 1998, 1999, Total Lines 51, 52
Page 640.24	Columns 1998, 1999, Lines 57 - 64 Columns 1998, 1998, Columns 1998, 1999, Total Lines 66-99
Page 640.25	Columns 1998, 1999, Total Lines 101 - 124
	Columns 1997, 1998, 1999, Total Lines 126 - 151
Page 640.26	Columns 1998, 1999, Columns 1997, 1998, 1999 Line 156 Lines. 159-184
Page 640.27	Columns 1997, 1998, 1999 Lines 186 - 244
	Columns 1997, 1998, 1999, Total Lines 246 - 280
Page 640.28	Columns 1997, 1998, 1999, Total Lines 286 -304
Page 640.29	Columns 1998 - 1999 Lines 305 - 307
	Columns 1997 - 1999 Lines 8 - 14
Page 640.30	Columns 1998, Columns 1997 - 1998 - Columns 1997, 1998, 1999, Total Lines 20 - 57 Line. 60 Lines. 64-83
Page 640.32	Columns 1996, 1997 Lines 86 - 114
Page 640.33	Columns 1996, 1997 Lines 6 - 55
Page 640.34	Columns 1996, 1997, Total Lines 57 - 106
Page 640.35	Columns 1996, 1997, 1998, 1999 Lines 109 - 138
Page 640.36	Columns 1996, 1997, 1998, 1999, Total Lines 7 - 64
	Lines 65 - 93

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket 960833-TP
Revised Direct Testimony of D. Caldwell
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ELECTRONIC FILES

BASIS FOR REQUEST

WORKSHEET INPUT FILES:

4WA.xls	1
FEATURES.xls	1
FLPHCOLL.XLS	1
FLVCOLL.XLS	1

OTHER FILES:

SECTION 3	ALL FILES	2
APPENDIX H	ALL FILES	2

OTHER ITEMS

BASIS FOR REQUEST

APPENDIX H:

Bellcore SCIS CD AND USER MANUALS	2
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