Legal Department

MARY K. KEYER General Attorney

JUL 31 PM 3: 16

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

July 31, 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 Responses to the Data Requests served by the Public Service Commission's Division of Auditing & Financial Analysis regarding 980000A-Undocketed Special Project and a Notice of Intent to Request 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 parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

FPSC BUREAU OF RECORDS

Mary K. Keyer (Ke)

Ericlosures

cc: All parties of record A. M. Lombardo R. G. Beatty William J. Ellenberg II This Notice of Intent was filed with Confidential Document No. <u>OROS9-92</u>. The document has been placed in the confidential files pending receipt of a request for confidential treatment.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

rate. . . . "

- In Item No. 5.C, the Commission requested work papers and documents used in the development and determination of the depreciation parameters provided by BellSouth in response to Item No. 5.A and B.
- In Item Nos. 13 and 14, the Commission requested copies of reports or analyses prepared by or for Standard & Poor's and Moody's Investor Services from January 1, 1997, through the present.
- 4. The documents provided in response to Item Nos. 5.C and those requested in Item Nos. 13 and 14 are proprietary, confidential business information that should not be publicly disclosed. This information falls within Florida Statutes § 364.183 (3)(e), which defines the terms "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market to the ultimate detriment of the consumer.
- 5. Furthermore, the information requested in Item Nos. 13 and 14 is so sensitive that any individual who reviews the information is deemed to be an "insider" for purposes of the Securities and Exchange Commission rules.
- 6. The information being provided is clearly confidential and proprietary under Florida Statutes, Section 364.183, including but not limited to § 364.183(3)(e).

CERTIFICATE OF SERVICE Special Project No. 980000A-SP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand-Delivery this 31st day of July, 1998 to the following:

Divison of Auditing and Financial Analysis Tim Devlin - Director Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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

Jack Shreve
Public Counsel
Charles J. Beck
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Mary K. Keyer (ke)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Discovery for Study on Fair &)
Reasonable Rates and on Relationships)
Among Costs and Charges Associated)
with Certain Telecommunications)
Services Provided by LECs, as)
Required by Chapter 98-277.

Docket No.: 980733-TL

Special Project No.: 980000A - SP

Filed: July 31, 1998

BELLSOUTH TELECOMMUNICATIONS, INC.'s NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth" or "Company") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Notice of Intent to Request Specified Confidential Classification for information produced in response to the fair and reasonable rates data requests served by the Public Service Commission, Division of Auditing and Financial Analysis.

1. In a Memorandum re: 980000A-SP Undocketed Special Project, dated June 19, 1998, the Commission, Division of Auditing & Financial Analysis, requested that BellSouth provide it with information on an embedded cost basis and for depreciation, tax and finance information on a basis to support any total service long-run incremental cost studies submitted by BellSouth to the Commission in response to the Division of Communications' data request also dated June 19, 1998. This information was requested for use by the Commission in providing a report to the Legislature regarding "the relationships among the costs and charges associated with providing basic local service, intrastate access, and other services provided by local exchange telecommunications companies," and the Commission's "conclusions as to the fair and reasonable Florida residential basic local telecommunications service

DOCUMENT NUMBER-DATE

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rate. . . . "

- In Item No. 5.C, the Commission requested work papers and documents used in the development and determination of the depreciation parameters provided by BellSouth in response to Item No. 5.A and B.
- In Item Nos. 13 and 14, the Commission requested copies of reports or analyses prepared by or for Standard & Poor's and Moody's Investor Services from January 1, 1997, through the present.
- 4. The documents provided in response to Item Nos. 5.C and those required ted in Item Nos. 13 and 14 are proprietary, confidential business information that should not be publicly disclosed. This information falls within Florida Statutes § 364.183 (3)(e), which defines the terms "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market to the ultimate detriment of the consumer.
- 5. Furthermore, the information requested in Item Nos. 13 and 14 is so sensitive that any individual who reviews the information is deemed to be an "insider" for purposes of the Securities and Exchange Commission rules.
- 6. The information being provided is clearly confidential and proprietary under Florida Statutes, Section 364.183, including but not limited to § 364.183(3)(e).

7. Because this information is proprietary, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification, pursuant to Rule 25-22.006(3), Florida Administrative Code, in order to allow the Commission Staff to take possession of the information without delay. The original of this notice has been filed with the Division of Records and Reporting.

Respectfully submitted this 31st day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

ROBERT G. BEATTO NANCY B. WHITE c/o Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5555

WILLIAM J. ELLENBERG T MARY K. KEYER 675 West Peachtree Street, Suite 4300 Atlanta, Georgia 30375 (404)335-0711

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CERTIFICATE OF SERVICE Special Project No. 980000A-SP

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