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Legal Department

E. Earl Edenfield, Jr.
General Attorney

99 NOV -8 PM 4: 27

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

RECORDS AND REPORTING

November 8, 1999

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. 990750-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification of Revised Exhibit DDC-4, 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,

E. Earl Edenfield Jr. (KE)

E. Earl Edenfield, Jr.

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

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 13728-99. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13727 NOV -8 99

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
Docket No. 990750-TP**

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

(+) Hand Delivery and Company Mail this 8th day of November, 1999 to the following:

Diana Caldwell (+)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
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BellSouth Center
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E. Earl Edenfield, Jr.
E. Earl Edenfield, Jr. (KR)

*Signed a Protective Agreement

Nanette S. Edwards, Esq. * (+)
Regulatory Attorney
ITC^ DELTACOM
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J. Michael Huey
J. Andrew Bertron, Jr. (+)
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Tallahassee, Florida 32302
Tel. No. (850) 224-7091
Fax. No. (850) 222-2593

Parkey Jordan, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	
)	Docket No. 990750-TP
Petition for Arbitration of ITC^DeltaCom)	
Communications, Inc. with BellSouth)	
Telecommunications, Inc. pursuant to the)	
Telecommunications Act of 1996.)	Filed: November 8, 1999
_____)		

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

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

1. On October 18, 1999, BellSouth filed a revised exhibit (DDC-4) to the direct pre-filed testimony of D. Daonne Caldwell, together with a Notice of Intent.
2. As portions of the revised exhibit (DDC-4) to the direct pre-filed testimony of D. Daonne Caldwell contain proprietary information, BellSouth files this Request for Specified Confidential Classification.
3. Attachment A to BellSouth's Request for 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.
4. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the documents, including those portions that are confidential and proprietary.

6. The information contained in the revised exhibit (DDC-4) to the direct pre-filed testimony of D. Daonne Caldwell includes customer specific information and vendor specific prices negotiated by BellSouth. Public disclosure of this information would provide competitors with an unfair advantage in future negotiations. In addition, the information includes BellSouth's forecasted costs, which if disclosed publicly would damage the competitive interests of BellSouth. (See Attachment A, Numbers 1 and 2, for a more detailed discussion). The information discussed in this Request for Confidential Classification is valuable 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 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 8th day of November, 1999

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White (cc)

NANCY B. WHITE

MICHAEL P. GOGGIN

c/o Nancy Sims

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(305) 347-5558

R. Douglas Lackey (cc)

R. DOUGLAS LACKEY

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 990750-TP
Request for Confidential Classification
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11/08/99**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF D. DAONNE CALDWELL'S REVISED EXHIBIT DDC-4 FILED OCTOBER 18, 1999, IN FLORIDA DOCKET NO. 990750-TP

Explanation of Proprietary Information

1. This information reflects customer specific information, and/or, 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. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is 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. The subject information includes BellSouth's forecasted costs. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF D. DAONNE CALDWELL'S REVISED EXHIBIT DDC-4 FILED OCTOBER 18, 1999, IN FLORIDA DOCKET NO. 990750-TP

DDC-4

<u>Page No.</u>	<u>Location</u>	<u>Reason</u>
000017	Columns 1996, 1997, 1998, 1999 and 2000.	1 and 2
	Column 2001, Lines 99, 111, 118 and 119	1 and 2
000022	Columns 1997-2001	1 and 2
000023	Columns 1997 and 1998	1
	Columns 1999-2001, Lines 405-409	1 and 2
000024	Columns 1998-2001, Lines 412-416	1 and 2
000039	Column 1997, Lines 10 and 27	1
	Column 1998	1
	Column 1999, Line 27	1
000040	Column 1997, Lines 69 and 70	1
	Column 1998, Lines 57, 59-61, 64, 69, 70 73, 74, 76, 83, 85-87, 90	1
000058	Column 1996, Line 12	1
	Column 1998, Lines 10-14, 21, 23, 31-34 41, and 43-5	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF D. DAONNE CALDWELL'S REVISED EXHIBIT DDC-4 FILED OCTOBER 18, 1999, IN FLORIDA DOCKET NO. 990750-TP

DDC-4

<u>Page No.</u>	<u>Location</u>	<u>Reason</u>
000060	Column 1996, Line 127	1
	Column 1997, Lines 96, 97 and 126	1
	Column 1998, Lines 97, 102, 103, 115, 116	1
	118, 120, 121, 125-130, 132-134	1
000061	Columns 1999, 2000, 2001 and Total, Line 136	1 and 2
000062	Column 1996, Lines 6,7, 10, 14-16, 31, 32, 35, 36, 42, 43	1
	Column 1997, Lines 7,16, 25, 32, 35, 42	1
	Column 1998, Lines 7, 11, 16, 19, 22, 28, 35, 42,45	1
	Column 1999, Lines 7, 19, 22, 35, 42,45	1
	Column 2000, Lines 19, 22, 35, 42, 45	1 and 2
	Column 2001, Lines 19, 22, 35, 42, 45	1
	Column Total, Lines 42, 43, 45	1 and 2
000063	Columns A-F	1 and 2
000065	Columns A-F	1 and 2
000066	Columns A-F	1 and 2