

**Legal Department**

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November 20, 1995

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

Re: Docket No. 921074-TP

Dear Mrs. Bayo:

Enclosed please find an original and fifteen copies of BellSouth Telecommunications, Inc.'s Seventh Request for Confidential Classification of Data to be filed in the above mentioned docket.

A copy of this letter is enclosed. Please indicate on the copy that the original was filed and return the copy to me. Copies of BellSouth's Seventh Request have been served on the parties shown on the attached Certificate of Service.

Sincerely,

*Mary Jo Peed*  
Mary Jo Peed (PJP)

Enclosures

cc: Robert G. Beatty  
A. M. Lombardo  
R. Douglas Lackey  
All Parties noted on Certificate of Service

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11616 NOV 20 95

FPSC-RECORDS/REPORTING

BEFORE  
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection ) DOCKET NO. 921074-TP  
Phase II and Local Transport )  
Restructure )  
\_\_\_\_\_ ) November 20, 1995

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), pursuant to Rule 25-22.006 (5)(c), Florida Administrative Code, and files its Seventh Request for Confidential Classification.

1. The Florida Public Service Commission ("Commission") issued Order No. PSC-95-0034-FOF-TP on January 9, 1995 that directed BellSouth to file tariffs, cost support, contribution analyses, and demand data for the restructure of its switched access local transport services ("LTR services"). Petitions for reconsideration of that Order were filed, considered and then ruled upon in Order No. PSC-95-0680-FOF-TP, June 6, 1995. BellSouth filed its tariffs complying with the Order on September 5, 1995.

2. On or about November 2, 1995, the Commission's Staff orally requested additional data relating to BellSouth's switched access local transport services tariffs. Because of the confidential nature of some of the information provided to the Staff on that date, BellSouth filed its Seventh Notice of Intent to Request Confidential Classification.

3. Pursuant to Rule 25-22.006(3)(a), BellSouth is, within the 21 days allowed by the Rule, filing its request for

DOCUMENT NUMBER-DATE

11616 NOV 20 95

FPSC-RECORDS/REPORTING

confidential classification of the information it contends is proprietary confidential business information.

4. Pursuant to Rule 25-22.006, Florida Administrative Code, BellSouth is affixing as Attachment "A" a listing identifying the page and line number at which the confidential material is found. BellSouth has affixed as Attachment "B" two copies of the material in which the proprietary confidential business information has been redacted. Appended hereto as Attachment "C" is one copy of the material with the proprietary confidential business information highlighted. The material for which confidential classification is sought is intended to be and is treated by BellSouth as private and has not been disclosed.

5. The information identified in Attachment "A" is proprietary confidential business information pursuant to §364.183, Florida Statutes and is exempt from the requirements of public disclosure of §119.07, Florida Statutes. The information reflects the costs and the financial contributions to BellSouth for providing the switched access local transport services. The costs were derived from a long run incremental cost study specific to Florida and is not readily available elsewhere. The demand data and contribution analyses are also not available outside of the Company. This information relates to the competitive interests of BellSouth and disclosure would impair the Company's competitive business. Pursuant to the actions of the 1995 Florida Legislature, local exchange telecommunications

services, including switched access local transport services, may be offered by any certificated firm beginning January 1, 1996. Since the effective date of the legislation, July 1, 1995, thirteen firms have become certificated or have certification petitions pending before the Commission. Additionally, the record in this proceeding clearly established that access transport services, whether special or switched are already competitive in Florida. (See, Hearing Transcript, Docket No. 921074-TP pp. 63-64; 67-68). Lastly, the Commission has authorized expanded interconnection for alternative access vendors for switched, special access, and private line services. Special access and private line services are considered to be substitutable services for the switched access services of the local exchange companies. For these reasons, the disclosure of the data contained in the cost support and the contribution analyses would be useful to competitors and potential competitors in making decisions regarding entry, pricing, marketing and overall business strategies concerning access services.

WHEREFORE, BellSouth requests that the Commission grant its request for confidential treatment.

Respectfully submitted this 20th day of November, 1995.

ATTORNEYS FOR  
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**CERTIFICATE OF SERVICE**  
**Dockets No. 921074-TL, 930955-TL,**  
**940014-TL, 940020-TL, 931196-TL, 940190-TL**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by United States Mail this 20th day of November 1995, to:

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*Mary Jo Peed*  
Mary Jo Peed



11/20/95

Attachment A

FPSC DOCKET 921074-TP

FPSC STAFF'S 10/26/95 ORAL DATA REQUEST

**Explanation for Proprietary Information**

- A. This information reflects BellSouth's cost to provide certain services. The 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. BellSouth is not able to obtain its competitor's cost to provide service, therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. In addition, 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.

**Location of the Proprietary Information**

<u>Page No.</u>	<u>Line/Col.Nos.</u>	<u>Reason</u>
F10C05Z 0000003-4	Cols. A-C	A
05-6	Cols. A-B	A
10	Lines 14,15,17,19, 27,29,31,33(nos)	A
011	Lines 10,13,16(nos)	A
012-22	Cols. C,D,F-I	A
024-25	Col. A	A
030,33	Lines A,B,D-G(nos)	A
031	Lines 9-11,13-16,21-26, 28-31,36-41(nos)	A
032	Cols. B,D; Lines 19,21,22(nos)	A
034	Lines 7,8,16-18,23,28, 39-41,46,51(nos)	A
035	Lines 11-16, Cols. A-L	A
036	Lines 4,5,17-19(nos)	A
037	Cols. A-E,G,H,J-L	A
038	Cols. Investment, A-K	F.

**LOCATION OF THE PROPRIETARY INFORMATION**

<u>Page No.</u>	<u>Line/Col.Nos.</u>	<u>Reason</u>	
F10C05Z	0000045,53,62,71	Line 9	A
	046,54,63,72	Cols. A,C,D,E,G=(E+F), G,I,K=(note 1), K,M,O,P	A
	047,55,64,73	Cols. A,B,D-H=(G/B), H,J,L,N=(note 1), N,P,R,S	A
	048,56,65,74	Line 9; Cols. II,IV,V; Cols. A,C,E,G,I-K,M,N	A
	049,57,66,75	Cols. A-E	A
	052,60,69,78	Cols. B-D	A
	061,70,79	Cols. C-D	A
	081	Cols. B-C	A
	082,83	Cols. A,C,E,G,I,K-M,O,P	A
	087	Lines 5,6,8(nos)	A
	091	Cols. A-E(incl. marginalia)	A
	092	Cols. C-E	A
	093,94	Cols. A-G	A
	095	Cols. A-G; Lines 39-42	A
	096,97	Cols. A-F	A

**LOCATION OF THE PROPRIETARY INFORMATION**

<u>Page No.</u>	<u>Line/Col.Nos.</u>	<u>Reason</u>	
F10C05Z	0000045,53,62,71	Line 9	A
	046,54,63,72	Cols. A,C,D,E,G=(E+F), G,I,K=(note 1), K,M,O,P	A
	047,55,64,73	Cols. A,B,D-H=(G/B), H,J,L,N=(note 1), N,P,R,S	A
	048,56,65,74	Line 9; Cols. II,IV,V; Cols. A,C,E,G,I-K,M,N	A
	049,57,66,75	Cols. A-E	A
	052,60,69,78	Cols. B-D	A
	061,70,79	Cols. C-D	A
	081	Cols. B-C	A
	082,83	Cols. A,C,E,G,I,K-M,O,P	A
	087	Lines 5,6,8(nos)	A
	091	Cols. A-E(incl. marginalia)	A
	092	Cols. C-E	A
	093,94	Cols. A-G	A
	095	Cols. A-G; Lines 39-42	A
	096,97	Cols. A-F	A