

MARY JO PEED
General Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(404) 335-0705

ORIGINAL
FILE COPY

December 7, 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 Eighth and Ninth 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 Request have been served on the parties shown on the attached Certificate of Service.

Sincerely,

Mary Jo Peed
Mary Jo Peed (02)

Enclosures

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

RECEIVED & FILED

Man
EPSC-BUREAU OF RECORDS

X-ny 11620-95
DOCUMENT NUMBER-DATE
12292 DEC-7 95
FPSC-RECORDS/REPORTING

BEFORE
THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Expanded Interconnection) DOCKET NO. 921074-TP
Phase II and Local Transport)
Restructure)
_____) December 7, 1995

BELLSOUTH TELECOMMUNICATIONS, INC.'S
EIGHTH AND NINTH 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 Eighth and Ninth 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") as well as tariffs for expanded interconnection services for special and switched access services. Petitions for reconsideration of that Order were filed, considered and then ruled upon by the Commission. BellSouth filed its LTR services tariffs and accompanying documentation on September 5, 1995. The tariffs for expanded interconnection services for special and switched access services were filed on November 20, 1995.

2. On or about November 15, 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 Eighth Notice of Intent

DOCUMENT NUMBER-DATE
12292 DEC-7 95
FPSC-RECORDS/REPORTING

to Request Confidential Classification.

3. Accompanying the filing of the tariffs for expanded interconnection services were cost data to support the tariff. Some of the data are considered by BellSouth to be confidential proprietary business information. As such BellSouth filed its Ninth Notice of Intent to Request Confidential Classification.

4. Pursuant to Rule 25-22.006(3)(a), BellSouth is, within the 21 days allowed by the Rule, filing its request for confidential classification of the information it contends is proprietary confidential business information.

5. 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.

6. 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 and

expanded interconnection services for special and switched access services. The costs were derived from a long run incremental cost study specific to Florida and is not readily available elsewhere. The cost information, demand data, and contribution analyses for BellSouth's LTR and expanded interconnection services 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 and expanded interconnection services, may be offered by any certificated firm beginning January 1, 1996. Since the effective date of the legislation, July 1, 1995, approximately 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 7th day of December, 1995.

ATTORNEYS FOR
BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty

ROBERT G. BEATTY (e2)
J. PHILLIP CARVER
c/o Nancy Sims
Suite 400, 150 South Monroe
Tallahassee, Florida 32301
(305) 347-5555

Mary Jo Reed

MARY JO REED (e2)
Suite 4300
675 W. Peachtree St., NE
Atlanta, Georgia 30375
(404) 335-0705

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 7th day of December 1995, to:

Tracy Hatch
Division of Communications
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0866

Donna Canzano
Division of Legal Services
Fla. Public Service Commission
101 East Gaines Street
Tallahassee, FL 32301

Patrick K. Wiggins
Wiggins & Villacorta, P.A.
Post Office Drawer 1657
Tallahassee, Florida 32302
atty for Intermedia

Intermedia Communications
9280 Bay Plaza Blvd., #270
Tampa, FL 33619-4453

Charles J. Beck
Deputy Public Counsel
Office of the Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Thomas Parker
GTE Florida Incorporated
P.O. Box 110, MC 7
Tampa, FL 33601-0110

Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601
atty for GTE FL

C. Dean Kurts
Central Tel. Co. of Florida
Post Office Box 2214
Tallahassee, FL 32316-2214

Brad E. Mutschelknaus
Rachel J. Rothstein
Danny White
Wiley, Rain, & Fielding
1776 K Street, NW
Washington, D.C. 20006
atty for IAC

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davison & Bakas
315 South Calhoun St. #716
Tallahassee, FL 32301
atty for FICA

Joseph P. Gillan
J. P. Gillan and Associates
Post Office Box 541038
Orlando, FL 32854-1038
atty for FIXCA

C. Everett Boyd, Jr.
Ervin, Varn, Jacobs, Odom &
Ervin
305 South Gasden Street
Tallahassee, FL 32301
atty for Sprint

Chanthina R. Bryant
Sprint Communications Co. Ltd.
3100 Cumberland Circle
Atlanta, GA 30339

Sprint Communications Co.
Ltd. Partnership
c/o Tony Key, Director
3100 Cumberland Circle
Atlanta, GA 30339

Laura L. Wilson, Esq.
Florida Cable Tele. Assoc.
Post Office Box 10383
310 North Monroe Street
Tallahassee, FL 32302
atty for FCTA

Ms. Carolyn M. Marek
Vice Pres. Reg. Affrs.
Time Warner Comm.
3012 Highwoods Blvd. Ste. 301
Raleigh, NC 27604

Peter M. Dunbar
Pennington & Haben, P.A.
Post Office Box 10095
Tallahassee, FL 32302
atty for Tiner Warner

Michael W. Tye
Suite 1410
106 East College Avenue
Tallahassee, FL
atty for AT&T

Harriet Eudy
ALLTEL Florida, Inc.
Post Office Box 550
Live Oak, FL 32060

Lee L. Willis
J. Jeffrey Wahlen
John P. Fons
Macfarlane, Ausley, Ferguson
& McMullen
Post Office Box 391
Tallahassee, FL 32302
atty for United/Centel, AllTel

Charles Dennis
Indiantown Telephone System
Post Office Box 277
Indiantown, Florida 34956

John A. Carroll, Jr.
Northeast Telephone Company
Post Office Box 485
Macclenny, Florida 32063-0485

Daniel V. Gregory
Quincy Telephone Company
Post Office Box 189
Quincy, Florida 32351

Jeff McGehee
Southland Telephone Company
210 Brookwood Road
Post Office Box 37
Atmore, Alabama 36504

Jodie L. Donovan, Esq.
Teleport Communications Group
2 Lafayette Center; Ste. 400
1133 Twenty First St., NW
Washington, DC 20036
atty for Teleport

Kenneth A. Hoffman, Esq.
Rutledge, Ecenia, Underwood,
Purnel & Hoffman, P.A.
P.O. Box 551
Tallahassee, FL 32302-0551
atty for Teleport

F. Ben Poag
United Telephone Company of FL
P.O. Box 165000
Altamonte Springs, FL 32716

Michael J. Henry
MCI Telecommunications Corp.
Suite 700
780 Johnson Ferry Road
Atlanta, GA 30342
atty for MCI

Richard D. Nelson
Hopping Boyd Green & Sams
Post Office Box 6526
Tallahassee, FL 32314

David B. Erwin, Esq.
Young, van Assenderp, Varnadoe
& Benton, P.A.
P.O. Box 1833
Tallahassee, FL 32302-1833
atty for Indiantown, Northeast,
Quincy, Southland

Mary J. Reed
Mary J. Reed (2)

FPSC DOCKET 921074-TP**COST SUPPORT FOR VIRTUAL COLLOCATION TARIFF (11/20/95),
CONTRIBUTION ANALYSIS AND CROSS-OVER POINT COST ANALYSIS
FOR LOCAL TRANSPORT RESTRUCTURING TARIFFS (11/15/95 Workshop)****Explanation for Proprietary Information**

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 these services. In addition, the disclosure of the contribution levels for the components of Local Transport and Virtual Expanded Interconnection Services (VEIS) would reveal the cost of providing those services, and in the case of VEIS, would impair BellSouth's ability to negotiate pricing on favorable terms.

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.

INDEX OF PROPRIETARY MATERIAL**VIRTUAL EXPANDED INTERCONNECTION SERVICE SUMMARY OF COSTS
FLORIDA - 07/17/95**

<u>Page No.</u>	<u>Line/Col. No.</u>
1 (F10C05Z 0000113)	Lines 6-10/Cols. A,B Lines 14-19/Cols A,B,C Lines 24-36/Cols. A,B
2 (F10C05Z 0000114)	Lines 9-16/Cols A,B

BELLSOUTH-FLORIDA CONTRIBUTION ANALYSIS

Page No.

Line/Col. No.

Page 1 thru 4

Lines 11-20/Cols B,D,E,F

LOCAL TRANSPORT RESTRUCTURE CROSS-OVER POINTS COST

Page No.

Line/Col. No.

Page 5 thru 7

Lines 6-11 and 21-26/Cols A & B