Legal Department

ORIGINAL

FPSC-RECORDS/REPORTING

FILE COPY

NANCY B. WHITE General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (404) 335-0710

June 17, 1996

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

RE: Docket No. 950985-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents 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,

Maney B. White (BL) Nancy B. White

				aney No con			1	
				Nancy B. White			ATA	96
ACK	Enc	losures					A Car	
AFA							3m	Nn
APP	CC:	All Parties of A. M. Lombardo	Reco	rd			3	2
17 A 17		R. G. Beatty						25
00411	and an a start of the second start of the seco	R. D. Lackey					72 1	0
CTR	and a set of the second se		100 m				Docul	\square
EAG		RECEIVED & FILED	1000 C				hase.7	
LEG	man of the second second second	14						
LIN		FPSC-BUREAU OF RÉCOR	2DS					
OPC	the survey of th	FFSC-BUILLIO GI MEUON		DOCUMENT NUMBER-DATE	R	edacted IENT NUMBER-D		
RCH					DOCUM	IENT NUMBER-D	ATE	
SEC	1			06520 JUN 17 %	06	521 JUN 17	005	
WAS	all to n	as fild.		FPSC-RECORDS/REPORTING	EDSC-	RECORDS/REPOR	TING	
OTH	allTON	nancaa		and a set of the set	1100	INCONTRACTOR ON		

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Resolution of petition(s)) to establish nondiscriminatory) rates, terms, and conditions for) interconnection involving local) exchange companies and alternative) local exchange companies pursuant) to Section 364.162, Florida) Statutes)

Docket No. 950985-TP

Filed: June 17, 1996

FILE COPY

BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PERMANENT PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Division Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order for the Company's Response to the requirements contained in Order No. PSC-0445-FOF-TP ("Order") issued on March 29, 1996 in the above captioned docket.

1. BellSouth is filing its Request for Confidential Classification for its responses to the Order because BellSouth deems the information requested to be confidential and proprietary business information. The document reflects details on how to access, enter, and change data in BellSouth's E911 Emergency System. This system must be protected from those who might make inappropriate use of the system. Disclosure of this information would impair the safety and welfare of the community.

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

> DOCUMENT NUMBER-DATE 06520 JUN 178

2919

3. Appended hereto in an envelope designated as Attachment B is one copy of the response with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the response with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. Regarding BellSouth's Response to the Order, this response is entitled to proprietary confidential classification. The document provides details concerning BellSouth's E911 Emergency System. This system is used by the citizens of Florida to notify the appropriate authorities in emergency situations. This document is provided only to those authorized to interface with the E911 Database and only upon execution of a nondisclosure agreement. Public disclosure of this information could jeopardize the safety and welfare of the general public in that unauthorized users could cause havoc with the system, thereby impairing the ability of emergency personnel to cope with emergencies. There are also legitimate concerns regarding safeguarding the privacy of the subscriber listings contained in the system. Section 364.183(c), Florida Statutes, expressly considers as proprietary confidential information any information relating to security systems, measures, or procedures. The information contained in BellSouth's Response to the Order, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

-2-

6. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above and contained in the indicated portions of the attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 17th day of June, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.

Ceatty (BZ)

ROBERT G. BEATTY PHILLIP J. CARVER c/o Nancy Sims Suite 400 150 South Monroe Street Tallahassee, Florida 32301 (305) 530-5555

Daugler Lerkey (BL)

R. DOUGLAS LACKEY NANCY B. WHITE 4300 Southern Bell Center 675 West Peachtree St., N.E. Atlanta, Georgia 30375 (404) 335-0747 (404) 335-0710

I HEREBY CERTIFY that a copy of the foregoing has been furnished by Federal Express this 17th day of June, 1996 to: RICHARD H. BRASHEAR DANIEL V. GREGORY ALLTELL FLORIDA, INC. QUINCY TELEPHONE COMPANY 206 WHITE STREET 107 W. FRANKLIN STREET LIVE OAK, FL 32060 QUINCY, GL 32351 904-364-2517 904-875-5214 F. B. POAG JOHN H. VAUGHAN CENTRAL TELEPHONE COMPANY ST. JOSEPH TELEPHONE AND OF FLORIDA TELEGRAPH COMPANY 502 5TH STREET 555 LAKE BORDER DRIVE APOPKA, FL 32703 PORT ST. JOE, FL 32456 407-889-6405 904-229-7221 LAURIE A. MAFFETT FERRIN SEAY THE SOUTH, INC.FLORALA TELEPHONE180 SOUTH CLINTON AVENUE522 N. 5TH STREETROCHESTER, NY 14646FLORALA AL SCALE716-777-5125FLORALA AL SCALE BEVERLY Y. MENARD GTE FLORIDA, INC. 106 EAST COLLEGE AVENUE LYNN B. HALL VISTA-UNITED TELECOMMUNICATIONS P.O. BOX 10180 SUITE 1440 TALLAHASSEE, FL 32301 LAKE BUENA VISTA, FL 32830 813-224-4825 407-827-2210 A. D. LANIER JODIE DONOVAN GULF TELEPHONE COMPANY TCG SOUTH FLORIDA 1133 21ST STREET, NW 115 W. DREW STREET PERRY, FL 32347 SUITE 400 904-584-0900 WASHINGTON, DC 20036 202-739-0010 ROBERT M. POST, JR. INDIANTOWN TELEPHONE MICHAEL W. TYE SYSTEM, INC. AT&T 16001 S.W. MARKET STREET INDIANTOWN, FL 34956 101 NORTH MONROE STREET SUITE 700 407-597-3113 TALLAHASSEE, FL 32301 904-425-6360 JOHN T. MCGLEW N.E. FLORIDA TELEPHONE ROBIN D. DUNSON, ESQ. COMPANY, INC. 1200 PEACHTREE STREET, NE PROMENADE I, ROOM 4038 ATLANTA, GEORGIA 30309 130 N. 4TH STREET MACCLENNY, FL 32063 904-259-2261 810-8689

RICHARD D. MELSONMICHAEL J. HENRYHOPPING GREEN SAM & SMITHMCI TELECOMMUNICATIONS CORP.123 S. CALHOUN STREET780 JOHNSON FERRY ROADTALLAHASSEE, FL 32301SUITE 700904-222-7500ATLANTA, GEORGIA 30342 PATRICK K. WIGGINS PAIRICK K. WIGGINSINTERMEDIA COMMUNICATIONS OFPETER M. DUNBAR, ESQ.FLORIDA, INC.CHARLES W. MURPHY, ESQ.WIGGINS & VILLACORTAPENNINGTON & HABEN, P.A.501 EAST TENNESSEE STREET, #B215 SOUTH MONROE STREETTAILAUACCEEEL 22208 TALLAHASSEE, FL 32308 904-222-1534 MESSER, VICKERS, CAPARELLO, MADSEN, LEWIS, GOLDMAN & METZ 215 S. CALHOUN STREET, #701 TALLAHASSEE, FL 32301 904-222-0720 FLOYD SELF 904-222-0720 COMMISSION 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FL 32399 904-613-6189 RICURES LAURA L. WILSON, ESQ. CHARLES F. DUDLEY, ESQ. FLORIDA CABLE TELECOMMUNICATIONS ASSN. 310 N. MONROE STREET TALLAW

RICHARD M. RINDLER SWIDLER & BERLIN, CHARTEREDWILLIAM H. HIGGINS3000 K STREET, NWSUITE 900SUITE 300250 S. AUSTRALIAN AVENUEWASHINGTON, DC 20007WEST PALM BEACH, FL 33401202-424-7500407-655-7447 JAMES C. FALVEY

KENNETH A. HOFFMAN, ESQ.ANTHONY P. GILLMANRUTLEDGE, ECENIA, UNDERWOOD,KIMBERLY CASWELLPURNELL & HOFFMANGTE FLORIDA, INC.215 SOUTH MONROE STREETc/o RICHARD M. FLETCHER106 EAST COLLEGE AVENUE SUITE 420 TALLAHASSEE, FL 32301-1841 904-681-6788

PAUL KOUROUPAS DIRECTOR, REGULSTORY AFFAIRS TIMOTHY DEVINE TELEPORT COMM. GROUP INC. MFS COMMUNICATIONS TWO TELEPORT DRIVE SUITE 300 STATEN ISLAND, NY 10311 718-355-2634

843-6373

2ND FLOOR TALLAHASSEE, FL 32301 904-222-3533

904-942-1181

WILLIAM H. HIGGINS

106 EAST COLLEGE AVENUE SUITE 1440 TALLAHASSEE, FL 32301

> 6 ONCOURSE PARKWAY SUITE 2100 ATLANTA, GA 30328 770-

2

DONALD L. CROSBY CONTINENTAL CABLEVISION 7800 BELFORT PARKWAY SUITE 270 JACKSONVILLE, FL 32256 904-731-8810

A. R. SCHLEIDEN CONTINENTAL FIBER TECHNOLOGIES D/B/A ALTERNET 4455 BAYMEADOWS ROAD JACKSONVILLE, FL 32217 904-448-3390

BILL WIGINTON HYPERION TELECOMM. BOYCE PLAZA III 2570 BOYCE PLAZA ROAD PITTSBURGH, PA 15241 412-221-1888

SUE E. WEISKE TIME WARNER COMM. 160 INVERNESS DRIVE WEST ENGLEWOOD, CO 80112

DONNA CANZANO FLORIDA PUBLIC SERVICE COMMISSION 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FL 32399 904-613-6202

Mancy & White (BL)

Attachment A

FPSC DOCKET 950985-TP RESPONSE TO ORDER No. PSC-96-0445-FOF-TP 911 AND E911 PROCEDURES

Explanation for Proprietary Information

E911 Local Exchange Carrier Guide For Facility-Based Providers dated 02/15/96. This document contains proprietary and confidential business information. This Guide provides details on how to access, enter and change data in BellSouth's (BST) E911 Emergency System. This system is used by the citizens of Florida to notify the appropriate authorities (Fire, Medical, or Police) in emergency situations. BellSouth releases copies of this document, only after the execution of a non disclosure agreement, to those who are authorized to interface with the E911 Data Base. This system must be protected from those who might make inappropriate use of the system. 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

PAGE NO.

LINE/COLUMN NUMBER

0000299 - 0000304	All
311-324	All
326 - 328	All
332 - 362	All
366 - 382	All
386 - 390	All
392	All
396 - 401	All