

NANCY B. WHITE  
General Attorney

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

September 24, 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. 96-11-TP; 96084-TP; 960916-TP

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Amended 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,  
*Nancy B. White (psw)*

Nancy B. White

ACK

AFA \_\_\_\_\_

APP Brunson

CAF \_\_\_\_\_ Enclosures

CMU Beatty

cc: All Parties of Record

CTR \_\_\_\_\_ A. M. Lombardo

EAG \_\_\_\_\_ R. G. Beatty

LEG \_\_\_\_\_ W. J. Ellenberg

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CERTIFICATE OF SERVICE  
DOCKET NO. 960833-TP  
DOCKET NO. 960846-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express this 24th day of September, 1996 to the following:

Tracy Hatch  
AT&T Communications of the  
Southern States, Inc.  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
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Tallahassee, FL 32314  
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Nancy B. White

CERTIFICATE OF SERVICE  
DOCKET NO. 960916-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by Federal Express this 24th day of September, 1996 to the following:

Staff Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

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1200 19th Street, N.W.  
Washington, D.C. 20036

Nancy B. White (fsw)

ORIGINAL  
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petitions by AT&T	)	
Communications of the Southern	)	
States, Inc., MCI	)	Docket No. 960833-TP
Telecommunications Corporation,	)	
MCI Metro Access Transmission	)	
Services, Inc., American	)	Docket No. 960846-TP
Communications Services, Inc.	)	
and American Communications	)	
Services of Jacksonville, Inc.	)	Docket No. 960916-TP
for arbitration of certain terms	)	
and conditions of a proposed	)	
agreement with BellSouth	)	
Telecommunications, Inc.	)	
concerning interconnection and	)	Filed: September 24, 1996
resale under the	)	
Telecommunications Act of 1996	)	
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BELLSOUTH TELECOMMUNICATIONS, INC.'S  
 AMENDED 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 Amended Request for Confidential Classification and Motion for Permanent Protective Order for the Attachments to the testimony of Robert C. Scheye (RCS-6) filed on August 30, 1996 in Docket 960833-TP and to the testimony of Robert C. Scheye (RCS-2) filed on September 9, 1996 in Docket 960916-TP.

1. BellSouth is filing its Request for Confidential Classification for the Scheye Attachments because it deems the information requested to be confidential and proprietary business information in that it reflects cost studies of various unbundled elements, such as loops and ports. Since competitors who will offer

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local services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

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.

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 Scheye's Attachments, this information is entitled to proprietary confidential classification for the following reasons.

The documents contain actual unit cost information for discrete cost elements. 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. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary

confidential business information any information relating to competitive business of the provider. The information contained in Scheye's Attachments, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

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 Scheye Attachments to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 24th day of September, 1996.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

J. PHILLIP CARVER

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5555



R. DOUGLAS LACKEY

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**ATTACHMENT A**  
**Request for Confidential Classification**  
**Page 1**  
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**ATTACHMENT A**

**FPSC DOCKET 960833-TP and 960916-TP**

**TESTIMONY EXHIBITS OF ROBERT SCHEYE**  
**960833-TP RCS-6 and 960916-TP RCS-2**

**Explanation of Proprietary Information**

This information contains actual unit cost information for discrete cost elements for the item under study. These costs reflect BellSouth's long run incremental cost of providing these elements on a going forward basis. 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. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning access services. This same information on competitors is not available to BellSouth. 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/COL. NO.

960833-TP RCS-6 Filed 8/30/96

1 All numbers in Columns Labeled: BellSouth LRIC and Hypothetical  
TELRIC plus Forward Looking Common Costs.

960916-TP RCS-2 Filed 09/09/96

1 All numbers in Columns Labeled: BellSouth LRIC and Hypothetical  
TELRIC plus Forward Looking Common Costs.