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Legal Department

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NANCY B. WHITE  
General Counsel-Florida

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BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

RECORDS AND  
REPORTING

November 6, 1998

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. 980800-TP (Supra Collocation)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for Late-Filed Deposition Exhibit No. 1 for Jerry Rubin and Late-Filed Deposition Exhibit No. 1 for W. Keith Milner, which we asked that you file in the captioned matter.

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,

*Nancy B. White*  
Nancy B. White (ba)

NBW/vf  
Enclosure

cc: All parties of record  
A. M. Lombardo  
R. G. Beatty  
William J. Ellenberg II

X-ref DN 11588-98  
DOCUMENT NUMBER-DATE  
12555 NOV -6 88  
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 980800-TP**

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

\* Federal Express and U.S. Mail this 6th day of November, 1998 to the following:

Beth Keating, Esq. \*  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
(850) 413-6199  
(850) 413-6250

Suzanne Fannon Summerlin, Esq. \*  
Supra Telecommunications and  
Information Systems, Inc.  
1311-B Paul Russell Rd., #201  
Tallahassee, Florida 32301  
Tel. No. (850) 656-2288  
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Supra Telecommunications and  
Information Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4220  
Fax. No. (305) 476-4282

Amanda Grant  
BellSouth Telecommunications, Inc.  
Regulatory & External Affairs  
675 West Peachtree Street, N.E.  
Room 38L64  
Atlanta, Georgia 30375

  
\_\_\_\_\_  
Nancy B. White (law)

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Emergency Relief of Supra ) Docket No. 980800-TP  
 Telecommunications and Information )  
 Systems, Inc., Against BellSouth )  
 Telecommunications, Inc. )  
 \_\_\_\_\_ ) Filed: November 6, 1998

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

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. On October 16, 1998, BellSouth filed the Late-Filed Deposition Exhibit No. 1 for Jerry Rubin and Late-Filed Deposition Exhibit No. 1 for W. Keith Milner, along with a Notice of Intent to Request Confidential Classification for the subject information on these exhibits which contain information considered to be confidential and proprietary to BellSouth in the above captioned docket.

2. BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in these documents is proprietary to BellSouth and includes information containing, among other things, vendor-specific and confidential business information. Vendor pricing is associated with switch equipment for BellSouth's central offices. Vendor specific pricing is negotiated by BellSouth and public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes such information is

DOCUMENT NUMBER-DATE

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classified as proprietary, confidential business information which is exempt from the Open Records Act.

3. Information responsive to this request also contains competitive business information about the type and quantity of equipment that BellSouth has placed in its central office in 1998. Competitors of BellSouth could use this information to determine the types of customers and services that BellSouth is marketing in this particular central office. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete. Thus, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183, Florida Statutes. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

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

5 Appended hereto as Attachment B is two copies of the requested documents with the confidential information deleted.

6 Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

7. The requested documents contain information considered to be confidential and proprietary to BellSouth, and includes information containing, among other things, vendor-specific information and confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would provide BellSouth's competitors with an unfair advantage. 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 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.

8. 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.

9. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 6th day of November, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE *(for)*

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558

*William J. Ellenberg II*

WILLIAM J. ELLENBERG II *(for)*

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0711

# ATTACHMENT A

**BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Rubin/Milner Late Filed Deposition  
Exhibits Nos. 1  
Request for Confidential Classification  
Page 1  
11/6/98**

## **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF LATE FILED DEPOSITION EXHIBITS NOS. 1 FOR RUBIN AND FOR MILNER FILED OCTOBER 16, 1998, IN DOCKET 980800-TP**

### **Explanation of Proprietary Information**

1. The subject information includes BellSouth's business plans, forecasts and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
2. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; sets forth and evaluates underlying components of specific competitive proposals along with supporting rationale such as results of market research and analysis; names of individuals assigned to certain projects; key details relating to the substance of such projects as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive response. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.
3. This information contains vendor 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 a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3) and (3)(d), Florida Statutes.

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Rubin/Milner Late Filed Deposition  
Exhibits Nos. 1  
Request for Confidential Classification  
Page 2  
11/6/98

## RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
2	Lines 1,2,8	1 and 3
	Dig Net Inter Column	1
	ISDN LTE Column	1
	Net Dbl Shelf Column	1
	Pwr Dist Cont Column	1
	Speech Link Con Column	1
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 33,34,38	1 and 3
3	Line 6	1 and 3
	Spares Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 13,14,18	1 and 3
4	Line 3	1 and 3
	SW Feature Pkgs Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 47,48,52	1 and 3
5	Line 3	1 and 3
	Equip Desc Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 49,50,54	1 and 3



**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
6	Line 3	1 and 3
	Equip Desc Column	1
	Product Code Column	1
	Cust Add	1
	Add Column	1 and 3
8	Lines 49,50,54	1 and 3
	Lines 1,8	1 and 3
	Dig Trk Equip Column	1
	ENET Column	1
	STP Link Interf	1
	Pwr Dist Cont	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 41,42,46	1 and 3
9	Line 5	1 and 3
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
11	Lines 10,11,15	1 and 3
	Lines 1,8	1 and 3
	Dig Trk Equip Column	1
	ENET Column	1
	Pwr Dist Cont	1
	Mtce Tools	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 37,38,42	1 and 3

**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
13	Lines 1,8	1 and 3
	Supernods Column	1
	Dig Net Inter Column	1
	Dig Trk Equip Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 42,43,47	1 and 3
14	Lines 1,5	1 and 3
	Equip Desc Column	1
	ENET Column	1
	STP Link Inter Column	1
	Pwr Dist Cont Column	1
	Speech Link Con Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 43,44,48	
15	Line 1,5	1 and 3
	Equip Desc Column	1
	Mtce Tools Column	1
	Trk Mod Equip Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 2,26,30	1 and 3
16	Lines 1,5	1
	Spares Column	1
	Prodcut Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 26,27,31	1 and 3

**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
17	Lines 1,2	1 and 3
	SW Feature Pkg Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 14,15,19	1 and 3
19	Lines 1,2,8	1 and 3
	Bought direct Column	1
	Supernode Column	1
	Dig Net Inter Column	1
	DigTrk Equip Column	1
	Line Conc Equip Column	1
	ISDN LCE Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 38,39,43	1 and 3
20	Lines 1,5	1 and 3
	Line Grp Equip Column	1
	ISDN LGE Column	1
	STP Link Intf Column	1
	LME4-Port Column	1
	Net Dbl Shelf Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 40,41,45	1 and 3

**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
21	Lines 1,5	1 and 3
	Pwr Dist Cont Column	1
	Subs Carr Mod Column	1
	Speech Link Con Column	1
	Mtce Tools Column	1
	Product Code Column	1
	Cust Add Column	1
	Add Column	1 and 3
	Lines 24,25,29	1 and 3
	22	Lines 1,5
Spares Column		1
Product Code Column		1
Cust Add Column		1
Add Column		1 and 3
Lines 9,10,14		1 and 3
23	Lines 1-5,18,29,30,32	1 and 3
24	Lines 1,5,6,8-10,12,14,15,17-23	1
25	Lines 1,2,4,10,16,18	1
26	Lines 25,24,23, B	1
27	Lines 30,29,28,27,26,B	1
28	Lines 27,26,25,B	1
29	Lines 1,2,4-8,12,13,15,17,18	1
30	Lines 1-4	3
	Remit To Column	3
	Lines 5-17	1 and 3
	Equipment Desc Column	1
	Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3
	Unit Price Column	1 and 3
	Qty Column	1
	Extended Price Column	1 and 3

**RUBIN LATE FILED DEPOSITION EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>	
31	Lines 1-5	3	
	Equipment Desc Column	1	
	Part No Column	1 and 3	
	Code 1 and Code 2 Column	1 and 3	
	Unit Price Column	1 and 3	
	Qty Column	1	
	Extended Price Column	1 and 3	
	32	Lines 1-5	3
		Equipment Desc Column	1
		Part No Column	1 and 3
Code 1 and Code 2 Column		1 and 3	
Unit Price Column		1 and 3	
Qty Column		1	
Extended Price Column		1 and 3	
33		Lines 1-5	3
		Equipment Desc Column	1
		Part No Column	1 and 3
	Code 1 and Code 2 Column	1 and 3	
	Unit Price Column	1 and 3	
	Qty Column	1	
	Extended Price Column	1 and 3	
	34	Lines 1-5	3
		Equipment Desc Column	1
		Part No Column	1 and 3
Code 1 and Code 2 Column		1 and 3	
Unit Price Column		1 and 3	
Qty Column		1	
Extended Price Column		1 and 3	
Lines 1-3			

MILNER LATE FILED DEPOSITON EXHIBIT NO. 1

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
4	Section of graph covering the years 1999-2000; Columns on chart showing the years 1999 and 2000.	1
8	Columns A and B	1
10	Section of graph covering the years 1999-2000; Columns on chart showing the years 1999 and 2000	1
14	Column A	1
15	Columns A and B	1
16	Section of chart showing the year 1999	1
17	Columns A, B, and C	1
18	Section of graph showing the years 1999-2002; Columns 2000, 20001 and 2002	1
19	Columns A and B	1
20	Column A	1
21	Columns A and B	1
22	Column A	1
23	Column A	1
24	Column A	1
25	Section of graph showing the years 1999-2002	1
26	Section of graph showing the years 1999-2001; spike graph showing the years 1999-2001; columns 1999-2001	1
27	Graph A, Section showing the years 1999-2001; graph B showing the years 1999-2001; Chart showing the years 1999-2001	1
28	Section of graph A showing the years 1999-2001; Graph B showing years 1999-2001; Columns 1999-2001	1

MILNER LATE FILED DEPOSITON EXHIBIT NO. 1 (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
31	Columns A and B	1
32	Columns A, B, C, D, E, F, G, H and I	1
35	Columns A, B, C and D	1
36	Columns A, B, C, D, E, F, G, H, I, J and K	1
39	Column A	1
40	Columns A, B, C, and D	1
41	Section of graph showing year 1999 - 2001; Columns 1999 and 2000	1
42	Section of graph showing the years 1999 through 2000; Columns 1999 and 2000	1
43	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
44	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
45	Section of graph showing the years 1999 - 2001; column 2000	1
46	Section of graph showing the years 1999 - 2001; column 2000	1
47	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
48	Section of graph A showing the years 1999- 2001; section of graph B showing the years 1999-2001; columns 1999 and 2000	1
51	Columns A, B, C, D, E and F	1
52	Column A	1
53	Section of graph showing the years 1999 - 2001; columns 1999 and 2000	1
56	Columns A, B, C and D	1
57	Section of graph showing the years 1999 - 2002; columns 1999, 2000, 2001, 2002	1
59	Columns A, B, C and D	1

MILNER LATE FILED DEPOSITON EXHIBIT NO. 1 (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
60	Column A	1
62	Columns A, B, C and D	1
63	Column A	1
64	Graph A and B – section showing the the years 1999-2002; Columns 1999 – 2002	1
65	Graph A and Graph B – section showing the years 1999-2002; Columns 1999-2002	1
67	Columns A, B and C	1
69	Columns A, B and C	1
70	Section of graph showing the years 1999-2002; columns 1999-2001	1
71	Section of graph showing the years 1999-2002; columns 1999-2001	1
72	Section of graph showing the years 1999-2002; columns 1999-2001	1
73	Section of graph showing years 1999 – 2002; columns 1999-2001	1
74	Section of graph showing years 1999-2002 Columns 1999-2002	1
75	Section of graph showing the years 1999-2002; columns 1999-2001	1
76	Section of graph showing the years 1999-2002; columns 1999-2001	1
77	Section of graph showing the years 1999-2002; columns 1999-2001	1
78	Section of graph showing the years 1999-2002; columns 1999-2001	1
79	Section of graph showing the years 1999-2002; columns 1999-2001	1
80	Section of graph A and B showing the years 1999-2002; columns 1999-2001	1



MILNER LATE FILED DEPOSITON EXHIBIT NO. 1 (Cont.)

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
82	Column A	1
83	Section of graph showing the years 1999-2002; columns 1999-2001	1
85	Column A	1
86	Section of graph showing the years 1999-2002; columns 1999-2001	1
87	Column A	1
88	Column A	1
89	Column A	1
90	Equipment Type; Column A and B; lines 1, 2 and 3	3
91	Equipment Type; lines 1, 4, 5, 7, 8, 11, 12 14, 15, 16, 17, 18, 24 and 26	3
92	Equipment Type Column; Lines 2, 3 7, 11, 18 and 20	3
93	Entire page	1
94	Section of graph showing months of November through October	1
95	Section of graph showing months of October through October	1
96	Section of graph showing months of October through October	1
97	Section of graph showing months of November through October	1
98	Section of graph showing the months of January through October	1
99	Section of graph showing the months of November through October	1
100	Section of graph showing the months of December through October	1
101	Section of graph showing the months of October through March	1

**MILNER LATE FILED DEPOSITON EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
102	Section of graph showing the months of November through September	1
103	Section of graph showing the months of October through April	1
104	Equipment type column; lines 1, 2, 4, 7, 9, 10, 12, 14, 15, 16, 17, 18	3
105	Section of graph showing 12/1/99 through 9/1/99	1
106	Section of graph showing 9/1/98 through 9/1/99	1
107	Section of graph showing 9/1/98 through 9/1/99	1
108	Section of graph showing 9/1/98 through 9/1/99	1
109	Section of graph showing 11/1/98 through 9/1/99	1
110	Section of graph showing 11/1/98 through 5/1/99	1
111	Section of graph showing 11/1/98 through 8/1/99	1
112	Lines 1-7, 16, 18, 25-30	1, 3
113	Lines 1-7, 16-19, 21-24, 31-40	1, 3
114	Lines 1-7, 15-19, 21-24, 31-36	1, 3
115	Lines 1-2, 16-20	1, 3
116	Lines 1-2, 5-8, 19-26, 31-35	1, 3
117	Lines 1-2, 5-8, 21-25, 30-34	1, 3
118	Lines 1-5, 9-11, 13-17	1
119	Lines 2-5, 13-16, 18-21, 30-32	1, 3
120	Lines 2-5, 13-16, 18-21, 29	1, 3
121	Entire page	1
123-124	Entire page	1
125	Lines 23-25	1
126	Lines 16, 26-30, 38 40	1
127	Lines 25-27	1
128-129	Entire page	1, 3

**BellSouth Telecommunications, Inc.  
FPSC Docket 980800-TP  
Rubin/Milner Late Filed Deposition  
Exhibits Nos. 1  
Request for Confidential Classification  
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**MILNER LATE FILED DEPOSITON EXHIBIT NO. 1 (Cont.)**

<u>Page No.</u>	<u>Line/Column</u>	<u>Reason</u>
130	Lines 2-5, 30	1, 3
131	Lines 1-5, 30-31	1, 3
132	Lines 1-5, 30-31	1, 3
133	Lines 1-5, 30-31	1, 3
134-180	Entire page	2