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ORIGINAL

RECORDS AND
REPORTING

99 NOV -5 PM 4:44

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November 5, 1999

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. 990649-TP

Dear Ms. Bayó:

Enclosed are an original and 15 copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification of certain information in BellSouth's Response to Staff's First Request for Production of Documents, filed October 15, 1999. Please file this document 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,

J. Phillip Carver
(PW)

J. Phillip Carver

Enclosures

cc: All parties of record
M. M. Criser, III
N. B. White
R. D. Lackey

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 13669. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

13670
DOCUMENT NUMBER-DATE

13670 NOV-5 99

FPSC-RECORDS/REPORTING

13669
DOCUMENT NUMBER-DATE

13669 NOV-5 99

FPSC-RECORDS/REPORTING

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FPSC-BUREAU OF RECORDS

13670

Request
DOCUMENT NUMBER-DATE
13668 NOV-5 99
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
pricing of unbundled network) Docket No. 990649-TP
elements)
_____) Filed: November 5, 1999

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

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

1. On October 15, 1999, BellSouth filed its Responses to the First Request for the Production of Documents filed in this docket by the Florida Public Service Commission Staff ("Staff"). At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification of the subject information.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the specific locations of the confidential information in both the interrogatory response and in the responsive documents. Attachment A also contains the specific justification for the request for confidential classification

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3. BellSouth has appended to this Request as Attachment B a redacted paper copy of the documents for which confidential classification is requested.

4. BellSouth has appended to this Request as Attachment C a highlighted paper copy of the documents for which confidential classification is requested.

5. The information requested concerns strategic planning information for fiber deployment and the associated technology. This information is treated as Proprietary and Confidential Business information by BellSouth. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know BellSouth's strategic plans for fiber deployment and the associated technology. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. 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, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

6. Some of this information includes prices negotiated by BellSouth with a specific vendor, Telcordia. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. Also, all of the information is proprietary to a vendor, Telcordia. This information relates to the SCIS (Switching Cost Information System) model developed by

Telcordia. There is also information in the SNC (Switched Network Calculator) model of BellSouth that is derived from the SCIS. The SCIS is a model that Telcordia considers to be proprietary, and BellSouth is contractually bound by an agreement with Telcordia to treat it as such. This model incorporates information given to Telcordia by switch vendors, as well as programming algorithms developed by Telcordia to translate the switch vendor information into cost profiles for various applications. This computer model has been developed by Telcordia over the course of more than a decade at a cost of tens of millions of dollars. If any of this information were made publicly available, the value of Telcordia's model and the related services it provides would decrease dramatically. Accordingly, this information is also both competitively sensitive and a trade secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), (d) and (e), Florida Statutes and is exempt from the Open Records Act.

7. 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.

8. 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 information that is not subject to public disclosure.

Respectfully submitted this 5th day of November, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

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185114

CERTIFICATE OF SERVICE
Docket No. 990649-TP

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

U.S. Mail this 5th day of November, 1999 to the following:

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J. Phillip Carver (AW)

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 1 of 2
11/05/99

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 2 AND 4 FILED OCTOBER 15, 1999, IN DOCKET 990649-TP

Explanation of Proprietary Information

1. The information requested concerns strategic planning information for fiber deployment and the associated technology. This information is treated as Proprietary and Confidential Business information by BellSouth. Public Disclosure of this information would provide BellSouth's competitors with an advantage in that they would know BellSouth's strategic plans for fiber deployment and the associated technology. This data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. 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, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.
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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 990649-TP
Request for Confidential Classification
Page 2 of 2
11/05/99

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
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990649-TP**

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