

PATRICK TURNER
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BellSouth Telecommunications, Inc.
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March 18, 2002

Mrs. Blanca S. Bayó
Director, Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 011119-TP (XO Arbitration)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for BellSouth's Response to XO Florida, Inc.'s 1st Request for Production of Documents, Item No. 1, which we ask that you file 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 to the parties shown on the attached Certificate of Service.

Sincerely,



Patrick Turner

(2)

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey

DOCUMENT NUMBER-DATE

03107 MAR 18 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 011119-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and Federal Express this 18th day of March, 2002 to the following:

Jason Fudge
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jfudge@psc.state.fl.us

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Dana Shaffer
XO Florida, Inc.
105 Molloy Street, Suite 200
Nashville, TN 37201
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Fax. No. (615) 345-1564
dana.shaffer@xo.com


Patrick Turner (22)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by XO Florida,)
Inc, for arbitration of unresolved issues with)
BellSouth Telecommunications, Inc.)

Docket No.: 011119-TP

Filed: March 18, 2002

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On February 25, 2002, BellSouth filed its Responses to XO's 1st Request for Production. BellSouth's response to Production of Documents, Item No. 1 contained an attachment, which contains information that reflects BellSouth's practices/procedures utilized by BellSouth to conduct business. This information is used by BellSouth in conducting its business and is considered a trade secret.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the attachment to Production of Documents, Item No. 1 includes practices/procedures utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to BellSouth and provide competitors with an unfair advantage in future negotiations. Corresponding information on competitors is not available to BellSouth. The information discussed in this Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary information pursuant to Section 364.24 and Section

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.

3. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

4. Attachment B to BellSouth's Request for Confidential Classification is a redacted copy of the confidential information.

5. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one copy of the proprietary document, which is confidential and proprietary.


6. 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.

7. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the Parties.

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

Respectfully submitted this 18th day of March 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



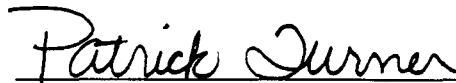
NANCY B. WHITE (22)

c/o Nancy Sims

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PATRICK TURNER (22)

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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 011119-TP
Request for Confidential Classification
Page 1 of 1
3/18/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO's FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM ONE FILED MARCH 18, 2002, IN FLORIDA DOCKET NO. 011119-TP

Explanation of Proprietary Information

1. The information requested contains practices/procedures utilized by BellSouth to conduct business. This information, if released, would allow BellSouth's competitors to have free access to certain intellectual property that was developed at significant expense to BellSouth. BellSouth's competitors can use this information to develop their own strategies without the burden and expense of developing this property for themselves. Thus the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and the information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes. In addition, this information, which BellSouth keeps as trade secrets, is valuable because BellSouth uses it in conducting its business. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

POD ITEM 1

<u>Location</u>	<u>Reason</u>
Attachment 1, Entire Document	1