

ORIGINAL

Legal Department

PATRICK W. TURNER
Senior Regulatory Counsel

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150 South Monroe Street
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October 11, 2002

RECEIVED-FPSC
02 OCT 11 PM 4:09
COMMISSION
CLERK

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

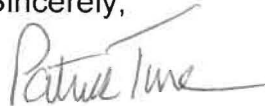
Re: Docket No. 020578-TP (Key Customer)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for responses filed to Florida Competitive Carriers Association and Mpower Communications Corporation's First Set of Interrogatories No. 1-19 and First Request for Production of Documents Item Nos. 1-5, 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 W. Turner

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

This confidentiality request was filed by or for a "telco" for DN ~~11082-02~~. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 10143-02)

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

11081 OCT 11 2002
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Competitive,)	
Carriers Association, for Expedited Review)	Docket No. 020578-TP
and Cancellation of BellSouth)	
Telecommunications, Inc's Key Customer)	
Promotional Tariffs.)	
<hr/>		Filed: October 11, 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 September 20, 2002, BellSouth Telecommunications, Inc. filed its Responses to FCCA's and MPower's First Set of Interrogatories and First Request for Production of Documents. BellSouth's responses to FCCA's and MPower's First Set of Interrogatories, Item No. 11(a) and Request for Production, Item No. 2 contain confidential business information that is proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification for FCCA and MPower's First Set of Interrogatories, Item No. 11(a) and First Request for Production of Documents, Item No. 2 because the information contained in this response includes vendor-specific pricing information that could cause competitive harm to BellSouth.

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.

DOCUMENT NUMBER: CA-
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FPSC-COMMISSION CLERK

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 proprietary copy of the confidential information.

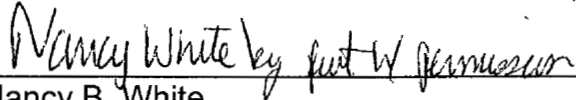
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth strives to keep it secret, and this information has not been generally disclosed.

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, pursuant to Chapter 364, Florida Statutes, 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 11th day of October, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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Miami, Florida 33130
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R. Douglas Lackey
Patrick W. Turner
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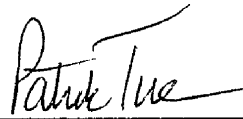
**CERTIFICATE OF SERVICE
DOCKET NO. 020578-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), electronic mail and U.S. Mail this 11th day of October 2002 to the following:

Felicia Banks (*)
Linda Dodson (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Joseph A. McGlothlin (*)
Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
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Attys. for FCCA
Attys. for Mpower
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Patrick W. Turner

(+) Signed Protective Agreement

ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO FCCA'S AND MPOWER'S FIRST SET OF INTERROGATORIES, ITEM NO. 11(A) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 2 FILED SEPTEMBER 20, 2002 IN FLORIDA DOCKET NO. 020578-TP

Explanation of Proprietary Information

1. This information reflects BellSouth's cost to provide certain services and includes trade secrets, information concerning bids or other contractual data, as well as information relating to BellSouth's competitive interests. This information also reflects information regarding the manner in which BellSouth typically configures various business services, and other confidential business information. The public disclosure of this information would provide BellSouth's competitors with a competitive advantage in that they would know BellSouth's costs in providing certain services. Furthermore, the disclosure of this information would impair BellSouth's ability for goods and services because its competitors will know BellSouth's pricing and cost information and any respective analysis. 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 364.183, Florida Statutes and is exempt from the Open Records Act.

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Interrogatory Item No. 14

<u>Location</u>	<u>Reason</u>
Page 2. Lines 1-2, Columns, A-C, E-G	1
Page 2. Line 3, Columns E-G	1
Page 4, Lines 1-3, Columns B-E, G-J	1
Page 4, Line 4, Columns A-C	1
Page 4, Line 5, Columns B-E, G-J	1
Page 6, Lines 1-12, Columns B-F	1
Page 6, Line 13, Columns B-E	1
Page 6, Lines 14, Columns B-F	1
Page 6, Line 17-18, Columns B-G	1
Page 6, Line 19, Columns F-H	1
Page 6, Line 22, Columns C, E, F	1
Page 6, Line 26-27, Columns A-G	1
Page 6, Line 28, Columns F-H	1
Page 6, Lines 31-32, Columns A-G	1
Page 6, Line 33, Columns B-G	1
Page 6, Line 34, Columns F-H	1
Page 8, Lines 1-2, Columns A-C, E-G	1
Page 8, Line 3, Columns E, G and H	1
Page 10, Line 7, Columns G, I, and K	1
Page 10, Lines 9-10, Columns A-K	1
Page 10, Lines 12-13, Columns A-K	1
Page 10, Line 15, Columns F-G, I-K	1
Page 10, Lines 25-30, Columns A-K	1
Page 10, Line 32, Columns F-G, I-K	1
Page 12, Lines 1-5, Columns A-G	1
Page 12, Lines 6, Columns E, G, and H	1
Page 12, Line 10-14, Columns A-G	1

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Interrogatory Item No. 14

Page 12, Line 15, Columns E, G-H 1

Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 1, Lines 1-21, Columns H-I	1
Page 2, Lines 1-6, Columns B-N	1
Page, Lines 19-22, Columns B-N	1
Page 5, Line 1, Columns B, D-J	1
Page 5, Lines 2-5, Columns B-J	1
Page 5, Lines 6-10, Columns B, D-J	1
Page 6, Line 1, Columns D, E, H-I	1
Page 6, Line 2, Columns D- E, H-I	1
Page 6, Line 3-9, Columns D-E, H-I	1
Page 6, Lines 10-12, Columns D-E, G-I	1
Page 6, Line 13, Columns D-E, H-I	1
Page 6, Lines 14-15, Columns D-E, G-I	1
Page 6, Line 16, Columns D-E, H-I	1
Page 6, Line 17, Columns D-E, G-I	1
Page 6, Line 18, Columns D-E, H-I	1
Page 6, Lines 19-20, Columns D-E, H-I	1
Page 6, Lines 21-24, Columns D-E, H-I	1
Page 6 Lines 25-26, Columns D-E, G-I	1
Page 6, Lines 27-28, Columns D-E, H-I	1
Page 6, Lines 29-31, Columns D-E, G-I	1
Page 6, Lines 32-33, Columns D-E, H-I	1

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Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 6, Line 34-37, Columns D-E, G-I	1
Page 6, Lines 38-41, Columns D-E, H-I	1
Page 6, Line 42, Columns D-E, G-I	1
Page 6, Line 43, Columns D-E, H-I	1
Page 7, Lines 1-6, Columns D-E, G-I	1
Page 7, Line 7, Columns D-E, H-I	1
Page 7, Line 8, Columns D-E, G-I	1
Page 7, Line 9-17, Columns D-E, H-I	1
Page 7, Line 18, Columns D-E, G-I	1
Page 7, Lines 19-20, Columns D-E, H-I	1
Page 7, Lines 21-22, Columns D-E, G-I	1
Page 7, Lines 23-25, Columns D-E, H-I	1
Page 7, Lines 26-27, Columns D-E, G-I	1
Page 7, Lines 28-29, Columns D-E, H-I	1
Page 7, Lines 30-31, Columns D-E, G-I	1
Page 7, Line 32, Columns D-E, H-I	1
Page 7, Lines 33-34, Columns D-E, G-I	1
Page 7, Lines 35-36, Columns D-E, H-I	1
Page 7, Lines 37-38, Columns D-E, G-I	1
Page 7, Line 39, Columns D-E, H-I	1
Page 7, Lines 40-41, Columns D-E, G-I	1
Page 7, Lines 42-43, Columns D-E, H-I	1
Page 7, Line 44, Columns D-E, G-I	1
Page 8, Line 1, Columns D-E, G-I	1
Page 8, Line 2, Columns D-E, H-I	1
Page 8, Lines 3-6, Columns D-E, G-I	1
Page 8, Lines 7-11, Columns D-E, H-I	1

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Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 8, Lines 12-13, Columns D-E, G-I	1
Page 8, Lines 14-15, Columns D-E, H-I	1
Page 8, Line 16, Columns D-E, G-I	1
Page 8, Lines 17-18, Columns D-E, H-I	1
Page 8, Line, 19, Columns D-E, G-I	1
Page 8, Line 21, Columns D-E, G-I	1
Page 8, Line 22, Columns D-E, H-I	1
Page 8, Line 23, Columns D-E, G-I	1
Page 8, Line 24, Columns D-E, H-I	1
Page 8, Line 25, Columns D-E, G-I	1
Page 8, Line 26, Columns D-E, H-I	1
Page 8, Lines 27-32, Columns D-E, G-I	1
Page 8, Line 33, Columns D-E, H-I	1
Page 8, Lines 34-35, Columns D-E, G-I	1
Page 8, Line 36, Columns D-E, H-I	1
Page 8, Lines 37-44, Columns D-E, G-I	1
Page 8, Line 45, Columns D-E, H-I	1
Page 9, Line 1, Columns D-E, G-I	1
Page 9, Lines 2-6, Columns D-E, H-I	1
Page 9, Lines 7-8, Columns D-E, G-I	1
Page 9, Lines 9-12, Columns D-E, H-I	1
Page 9, Line 13, Columns D-E, G-I	1
Page 9, Line 14, Columns D-E, H-I	1
Page 9, Line 15, Columns D-E, G-I	1
Page 9, Lines 16-17 Columns D-E, H-I	1
Page 9, Line 18, Columns D-E, G-I	1
Page 9, Line 19, Columns D-E, H-I	1
Page 9, Lines, 20-23, Columns D-E, G-I	1
Page 9, Lines 24, Columns D-E, H-I	1

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Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 9, Lines 25-28, Columns D-E, G-I	1
Page 9, Lines 29-31, Columns D-E, H-I	1
Page 9, Line 32, Columns D-E, G-I	1
Page 9, Lines 33-38, Columns D-E, H-I	1
Page 9, Lines 39-40, Columns D-E, G-I	1
Page 9, Line 41, Columns D-E, H-I	1
Page 9, Lines 42-44, Columns D-E, G-I	1
Page 10, Lines 1-4, Columns D-E, G-I	1
Page 10, Lines 5-6, Columns D-E, H-I	1
Page 10, Line 7, Columns D-E, G-I	1
Page 10, Line 8, Columns D-E, H-I	1
Page 10, Line 9, Columns D-E, G-I	1
Page 10, Lines 10-12, Columns D-E, H-I	1
Page 10, Lines 13-15, Columns D-E, G-I	1
Page 10, Line 16, Columns D-E, H-I	1
Page 10, Lines 17-24, Columns D-E, G-I	1
Page 10, Lines 25-26, Columns D-E, H-I	1
Page 10, Lines 27-32, Columns D-E, G-I	1
Page 11, Lines 1-3, Columns C-G	1
Page 11, Line 4, Columns E, G-H	1
Page 12, Lines, 1-5 Columns C-G	1
Page 12, Line 6, Columns E, G-H	1
Page 12, Lines 9-13, Columns C-G	1
Page 12, Line 14, Columns E, G-H	1
Page 12, Line 17, Columns C-G	1
Page 12, Line 20, Columns E, G-H	1
Page 13, Lines 1-5, Columns C-G	1

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Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 13, Line 6, Columns E, G-H	1
Page 14, Line 1, Columns C-H	1
Page 14, Line 2, Columns C-G	1
Page 14, Lines 3-4, Columns C-G, I-J	1
Page 14, Line 5, Columns C-F	1
Page 14, Line 6, Columns F-H	1
Page 14, Line 7, Columns C-H	1
Page 14, Line 8, Columns C-G, I-J	1
Page 14, Lines 9, Columns C-G, I-J	1
Page 14, Line 10, Columns C-F	1
Page 14, Line 11, Columns F-H	1
Page 14, Line 12, Columns C-H	1
Page 14, Line 13, Columns C-G	1
Page 14, Line 14, Columns C-F	1
Page 14, Line 15, Columns F-H	1
Page 15, Lines 1-7, Columns C-G	1
Page 15, Line 8, Columns E, G-H	1
Page 15, Lines 9-10, Columns C-F	1
Page 15, Line 11, Columns C, E-F	1
Page 15, Line 12, Columns F-G	1
Page 16, Lines 1-4, Columns C-G	1
Page 16, Line 5, Columns E, G-H	1
Page 16, Lines 8-13, Columns C-G	1
Page 16, Line 14, Columns E, G-H	1
Page 17, Lines 1-2, Columns C-G	1
Page 17, Line 3, Columns C-F	1
Page 17, Line 4, Columns F-H	1

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Attachment (1)

<u>Location</u>	<u>Reason</u>
Page 18, Lines 1-4, Columns D-I	1
Page 18, Line 5, Columns F-J	1
Page 19, Lines 1-14, Columns C-F	1
Page 19, Lines 15-16, Columns C-G	1
Page 19, Line 17, Columns F-H	1
Page 19, Line 18, Columns C, E-F	1
Page 20, Lines 1-39, Columns D-F	1
Page 21, Line 1, Columns D-F	1

Production of Document Item No. 2

<u>Location</u>	<u>Reason</u>
Pages 2-15, Columns 6-29	1