

T. Michael Twomey  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0750

October 17, 2001

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. 001305-TP (Supra-BellSouth Arbitration)**

Dear Mrs. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification, 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,

  
T. Michael Twomey  
(KA)

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

DOCUMENT NUMBER-DATE

13209 OCT 17 2001

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
Docket No. 001305-TP**

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

Federal Express this 17<sup>th</sup> day of October, 2001 to the following:

Wayne Knight  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6232  
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Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive  
Kroger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
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[mbuechele@stis.com](mailto:mbuechele@stis.com)

Brian Chaiken  
Paul Turner (+)  
Supra Telecommunications and  
Information Systems, Inc.  
2620 S. W. 27<sup>th</sup> Avenue  
Miami, FL 33133  
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[bchaiken@stis.com](mailto:bchaiken@stis.com)

  
T. Michael Twomey (ba)

**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Arbitration of the Interconnection )  
Agreement Between BellSouth Telecommunications, ) Docket No. 001305-TP  
Inc. and Supra Telecommunications & Information )  
System, Inc., Pursuant to Section 252(b) of the ) Filed: October 17, 2001  
Telecommunications Act of 1996. )  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED 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 September 26, 2001, BellSouth filed a Local Order Number Tracking User ("LON") Guide in response to Supra Telecommunications & Information System, Inc.'s Request for Production of Documents No. 12 along with a Notice of Intent to Request Confidential Classification.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in the LON Guide contains confidential business information that is considered proprietary to BellSouth. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential business information. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes. A more specific description of this information and the reasons why said information is confidential is contained in Attachment A.

3. 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.

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

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

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 17th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (KA)  
JAMES MEZA III  
c/o Nancy Sims  
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(305) 347-5558

*T. Michael Twomey*

R. DOUGLAS LACKEY (KA)  
T. MICHAEL TWOMEY  
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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 001305-TP  
Request for Confidential Classification  
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10/17/01**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO SUPRA'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 12, FILED SEPTEMBER 26, 2001 IN FLORIDA DOCKET NO. 001305-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 which 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 it is used by BellSouth in conducting its business. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 001305-TP  
Request for Confidential Classification  
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10/17/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO SUPRA'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 12, FILED  
SEPTEMBER 26, 2001 IN FLORIDA DOCKET NO. 001305-TP**

**POD NO. 12**

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