

Meredith E. Mays  
Regulatory Counsel

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

February 13, 2003

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. 020507-TL (FCCA Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification its response to FCCA's 2<sup>nd</sup> Request for Production of Documents Item No. 2, 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,

  
Meredith E. Mays (LMA)

Enclosure

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

DOCUMENT NUMBER-DATE

01512 FEB 13 03

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 020507-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and U.S. Mail this 13<sup>th</sup> day of February 2003 to the following:

Patricia Christensen  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[pchrste@psc.state.fl.us](mailto:pchrste@psc.state.fl.us)

Vicki Gordon Kaufman (+)  
Joseph A. McGlothlin  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Represents FCCA  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)

Nanette Edwards, Esq. (+)  
Director - Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
Fax. No. (256) 382-3936  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Floyd Self, Esq. (+)  
Messer, Capareello & Self  
215 S. Monroe Street  
Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302  
Represents ITC^DeltaCom  
[fself@lawfla.com](mailto:fself@lawfla.com)

  
Meredith Mays (CA)

**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida Competitive Carriers Association Against BellSouth Telecommunications, Inc. And Request for Expedited Relief )  
 ) Docket No. 020507-TL  
 )  
 )  
 )  
 ) Filed: February 13, 2003

---

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

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

1. On January 23, 2003, BellSouth Telecommunications, Inc. filed its Responses to the Florida Competitive Carriers Association's Second Request for Production of Documents (2-9). In addition, BellSouth filed a Notice of Intent with respect to Item No. 2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification of the documents provided in response to Request for Production No. 2 of the Florida Competitive Carriers Association's Second Request for Production because said documents contain competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information 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.

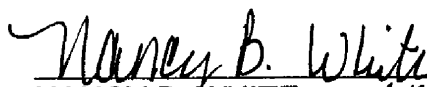
4. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.


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 13<sup>th</sup> day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (CA)  
JAMES MEZA III  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. DOUGLAS LACKEY (CA)  
Meredith E. Mays  
675 W. Peachtree Street  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0750

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
Request for Confidential Classification  
Page 1 of 2  
2/13/03**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO FCCA'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 2 FILED JANUARY 23, 2003, IN FLORIDA DOCKET NO. 020507-TL**

#### **Explanation of Proprietary Information**

1. This information contains competitive business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
Request for Confidential Classification  
Page 1 of 2  
2/13/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>ND</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 2  
FILED JANUARY 23, 2003, IN FLORIDA DOCKET NO. 020507-TL**

**POD NO. 2**

Location

Reason

Entire Document

1