

ORIGINAL

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COMMISSION
CLERK

April 8, 2003

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. 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,

J. Phillip Carver

J. Phillip Carver (KA)

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 0329403. 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. 02618-03)

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REDACTED
DOCUMENT NUMBER-DATE
03295 APR-8 8
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CONFIDENTIAL
DOCUMENT NUMBER-DATE
03294 APR-8 8
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REQUEST
DOCUMENT NUMBER-DATE
03293 APR-8 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (#), First Class U.S. Mail, and Electronic Mail this 8th day of April, 2003 to the following:

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J. Phillip Carver (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)	Docket No. 981834-TP
For Commission Action To Support)	
Local Competition In BellSouth)	
Telecommunications, Inc.'s service)	
Territory)	
)	
In re: Petition of ACI Corp. d/b/a/)	
Accelerated Connections, Inc. for)	Docket No. 990321-TP
Generic Investigation into Terms and)	
Conditions of Physical Collocation)	
)	
<hr/>		Filed: April 8, 2003

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On March 18, 2003, BellSouth filed its response to AT&T's Second Request for Production of Documents. Request Nos. 9, 12, and 23 contain information that is proprietary to BellSouth. In response to a request by the Staff of the Florida Public Service Commission, BellSouth provided to the Staff a copy of its response (including this proprietary information) at the same time BellSouth responded to AT&T. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the Production of Documents, Request Nos. 9, 12 and 23, includes: contractual data that relates to prices charged to particular vendors. If this information was publicly disclosed, this disclosure would impair BellSouth's ability to contact for goods and services on favorable terms.

Accordingly, this information is entitled to confidential classification both under the general standard of Florida Statutes § 364.183(3) and specifically under §364.183(3)(d). 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 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 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 redacted copies of the documents containing the confidential information.

5. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, 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 Section 364.183, 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 8th day of April, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 1 of 3
04/08/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO AT&T'S 2ND REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 9, 12, AND 23 FILED MARCH 18, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

Explanation of Proprietary Information

1. This information reflects cost study information that includes vendor-specific pricing information that is considered proprietary to BellSouth. Disclosure of this information would cause competitive harm to BellSouth. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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RESPONSE TO AT&T's 2ND REQUEST FOR PRODUCTION OF DOCUMENTS,
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NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 9

<u>Location</u>	<u>Reason</u>
Column C	1

PRODUCTION OF DOCUMENT REQUEST NO. 12

<u>Location</u>	<u>Reason</u>
Column D, Lines 24, 26, 29, 31, 39, 42, 46, 48, 51, 53	1
Column D, Lines 61, 64, 80, 110, 114	1
Column G, Lines 24, 26, 29, 31, 34, 37, 39, 42, 46, 48	1
Column G, Lines 51, 53, 56, 59, 61, 64, 69, 73, 76, 80	1
Column G, Lines, 83, 85, 88, 90, 93, 95, 101, 102, 107	1
Column G, Lines 110, 114, 117, 119, 124, 126, 129, 131	1
Column G, Lines 136, 138, 140, 142, 146, 148, 150, 152,	1
Column G, Lines 156, 158, 160, 162, 164, 166, 170, 172,	1
Column G, Lines 174, 176, 178, 180	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
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04/08/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
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NOS. 981834-TP AND 990321-TP

PRODUCTION OF DOCUMENT REQUEST NO. 23

<u>Location</u>	<u>Reason</u>
Column A, Lines 1-6	1
Column B, Lines 1, 2, 5, 6	1
Column C, Lines 1, 2, 5, 6	1
Column D, Lines 7-8	1
Column E, Lines 9-12	1
Column F, Lines 7-13	1
Column G, Lines 7-13	1