

ORIGINAL

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May 5, 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 are 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

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
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OTH _____

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FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN 04062-03. 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.

lx-ref. 03438-03

DOCUMENT NUMBER-DATE

04061 MAY-5 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 5th day of May, 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)	
)	Filed: May 5, 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 April 14, 2003, BellSouth filed its response to Florida Public Commission Staff's Fifth Request for Production of Documents. BellSouth's Response to Staff's Fifth Requests for Production of Documents, Request Nos. 29, 43, 45, 53, and 54 contain information that is proprietary to BellSouth. 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 BellSouth's Response to Staff's Fifth Request for Production of Documents, Request Nos. 29, 45, 53 and 54 include vendor specific information that relates to BellSouth's competitive interests, contractual data and other confidential business practices/procedures utilized by BellSouth to conduct business. BellSouth hereby withdraws its request for confidential classification of the

document produced in response to Staff's 5th Request for Production, Item No. 43. 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. 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 5th day of May, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
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05/05/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 5th REQUEST FOR PRODUCTION OF
DOCUMENTS, REQUEST NOS. 29, 45, 53, AND 54 FILED APRIL 14, 2003, IN
FLORIDA DOCKET NOS. 981834-TP AND 990321-TP**

Explanation of Proprietary Information

1. The information contains vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3) and (3)(d), Florida Statutes.
2. The information contained reflects actual and projected expenditure for BellSouth's RTU software budget. This information discloses the company's direction for deployment of specific types of software and operational systems, which could give an ALEC competitive insight to BellSouth's business plans and therefore should be afforded confidential classification pursuant to Florida Statute Section 364.183(3)(e).
3. The information is contractual data, the disclosure of which would impair BellSouth's ability to contract for goods and services on favorable terms. Accordingly, the subject information should be classified as proprietary, confidential business information pursuant to Florida Statutes Section 364.183(3)(d).

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
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05/05/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 5TH REQUEST FOR PRODUCTION OF
DOCUMENTS, REQUEST NOS. 29, 45, 53, AND 54 FILED APRIL 14, 2003, IN
FLORIDA DOCKET NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 29

<u>Location</u>	<u>Reason</u>
Page 2, Column A	1
Page 3, Columns A and B	1

PRODUCTION OF DOCUMENT REQUEST NO. 45

<u>Location</u>	<u>Reason</u>
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Page 3, Columns D-F, Line 1	2
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Page 6, Columns A-H	2

PRODUCTION OF DOCUMENTS REQUEST NO. 53 AND REQUEST NO. 54

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