E. EARL EDENFIELD, JR. Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0763

May 9, 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

Undocketed Matter: Unlimited Answers Plan Promotion

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Long Distance, Inc.'s Request for Specified Confidential Classification, which we ask that you file in the captioned matter.

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.

S. Earl Edenfield, Jr. (CA)

Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	Unlimited Answers Plan Promotion) Undocketed	
) Filed: May 9, 200	3

BELLSOUTH LONG DISTANCE, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Long Distance, Inc. ("BellSouth Long Distance"), 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 18, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed its response to the Florida Public Service Commission's Inquiry on the Unlimited Answers Plan Promotion. BellSouth Long Distance's Response to the Commission's Inquiry, Item No. 4 contains information that is proprietary to BellSouth Long Distance. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.
- 2. BellSouth Long Distance hereby files this Request for Specified
 Confidential Classification because the information contained in BellSouth Long
 Distance's Response to Staff's Inquiry, Item No. 4 includes competitive information and
 other confidential business information utilized by BellSouth Long Distance to conduct
 business. A more specific description of this information is contained in Attachment A.
 Public disclosure of this information would cause competitive harm to BellSouth Long
 Distance and provide competitors with an unfair advantage in future negotiations. The
 information discussed in the Request for Specified Confidential Classification is valuable
 and BellSouth Long Distance 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 Long Distance'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 Long Distance as confidential.
- 4. Attachment B to BellSouth Long Distance's Request for Confidential Classification is redacted copies of the documents containing the confidential information.
- 5. Attachment C to BellSouth Long Distance'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 Long Distance 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 Long Distance 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 9th day of May 2003.

BELLSOUTH LONG DISTANCE, INC.

NANCY B. WHITE JAMES MEZA III

c/o Nancy Sims

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ATTACHMENT A

BellSouth Long Distance, Inc. Undocketed Request for Confidential Classification Page 1 of 2 05/01/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG DISTANCE'S RESPONSE TO STAFF'S INQUIRY, ITEM NO. 4 FILED APRIL 18, 2003

Explanation of Proprietary Information

1. This information contains business information related to competitive interests of BellSouth Long Distance that is proprietary to BellSouth Long Distance. Disclosure of this data would impair the competitive business and cause harm to BellSouth Long Distance. Specifically, this information relates to internal margins, bad debt, average network access charges, and jurisdictional traffic percentage distributions, etc. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183 (3)(d).

ATTACHMENT A

BellSouth Long Distance, Inc. Undocketed Request for Confidential Classification Page 2 of 2 05/09/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG-DISTANCE'S RESPONSE TO STAFF'S INQUIRY, ITEM NO. 4 FILED APRIL 18, 2003

ITEM NO. 4

LocationReasonParagraphs 2-41