

Meredith E. Mays  
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BellSouth Telecommunications, Inc.  
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July 1, 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 for Responses to Staff's Interrogatories Nos. 24, 41 and 64; and the attachment to BellSouth's Response to Staff's Request for Production, Item No. 4, 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 (CA)

Enclosure

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

496644

DOCUMENT NUMBER-DATE  
05878 JUL-1 8  
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 1<sup>st</sup> day of July 2003 to the following:

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Meredith E. Mays (RM)

**(+) 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: July 1, 2003

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**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 June 10, 2003, BellSouth Telecommunications, Inc. filed its Responses and Objections to Staff's 2<sup>nd</sup> Interrogatories and Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to Interrogatory Nos. 24, 41 and 65 as well as the attachment to BellSouth's response to Request for Production, Item No. 4. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification of the responses and documents provided in response to Staff's 2<sup>nd</sup> Interrogatories and 2<sup>nd</sup> Request for Production of Documents as they 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.

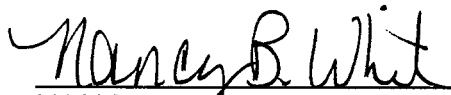
4. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.


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 1<sup>st</sup> day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
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\_\_\_\_\_  
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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
Request for Confidential Classification  
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7/1/03**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO STAFF'S 2<sup>ND</sup> INTERROGATORIES, ITEM NOS. 24, 41 AND 65 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST NO. 4 AS FILED JUNE 10, 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. In addition, this information is purchased from individual marketing research firms, hired on behalf of BellSouth to conduct market research. Therefore, such information is trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act. Fl. Stat. § 364.183 (3)(e).

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
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<u>Location</u>	<u>Reason</u>
<u>INTERROGATORY NO. 24</u>	
Line 9	1
<u>INTERROGATORY NO. 41</u>	
Line 4	1
<u>INTERROGATORY NO. 65</u>	
Line 2	1
<u>REQUEST FOR PRODUCTION NO. 4</u>	
Entire document	1