Meredith E. Mays Senior Regulatory Counsel

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

July 18, 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

Docket No. 020507-TL (FCCA Complaint) Re:

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses and Objections to AT&T's 1st Interrogatories Item Nos. 2, 3 and 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,

mendell (Mans - Mars (KA)

Meredith E. Mays

Enclosure

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

> DOCUMENT NUMBER-DATE 06466 JUL 188 FPSC-COINDSSION 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 18th day of July 2003 to the following:

Patricia Christensen Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 pchriste@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 Attys. for AIN Attys. for AIN Attys. for AT&T <u>vkaufman@mac-law.com</u> <u>imcglothlin@mac-law.com</u>

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

Floyd Self, Esq. (+) Messer, Caparello & Self 215 S. Monroe Street Suite 701 P.O. Box 1876 Tallahassee, FL 32302 Represents ITC^DeltaCom fself@lawfla.com Virginia Tate (+) AT&T Law and Government Affairs 1200 Peachtree Street, N.E. Suite 8100 Atlanta, Georgia 30309 Tel. No. (404) 810-4922 Fax. No. (404) 810-5901 vctate@att.com

Richard D. Melson (+) Hopping Green Sams & Smith, P.A. 123 South Calhoun Street Tallahassee, FL 32314 Tel. No. (850) 222-7500 Fax. No. (850) 224-8551 Atty. For MCI rmelson@hgss.com

Donna Canzano McNaulty (+) MCI WorldCom Communications, Inc. 1203 Governors Square Boulevard, Suite 201 Tallahassee, Florida 32301 Tel. No. (850) 422-1254 Fax. No. (850) 422-2586 donna.mcnulty@wcom.com Dulaney L. O'Roark III (+) WorldCom, Inc. Six Concourse Parkway Suite 3200 Atlanta, GA 30328 Tel. No. (770) 284-5498 Fax. No. (770) 284-5488 De.ORoark@mci.com

Moredit E. Mays (ICA)

(+) Signed Protective Agreement

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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 18, 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 July 3, 2003, BellSouth Telecommunications, Inc. filed its Responses and Objections to AT&T's 1st Interrogatories and Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to Interrogatory Nos. 2, 3 and 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 AT&T's 1st Interrogatories 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 18th day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

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

R. DOUGLAS LACKEY 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 7/18/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO AT&T's 1st INTERROGATORIES, ITEM NOS. 2, 3 and 4 AS FILED JULY 3, 2003, IN FLORIDA DOCKET NO. 020507-TL

Explanation of Proprietary Information

 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 Request for Confidential Classification Page 2 of 2 7/18/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO AT&T's 1st INTERROGATORIES, ITEM NOS. 2, 3 and 4 AS FILED JULY 3, 2003, IN FLORIDA DOCKET NO. 020507-TL

Location	<u>Reason</u>
Response to Interrogatory No. 2	
Lines 2-9, Columns B-F	1
Response to Interrogatory No. 3	
Lines 2-9, Columns B-F	1
Response to Interrogatory No. 4	
Lines 2-4, Column B	1