

ORIGINAL

Legal Department

E. EARL EDENFIELD, JR.
Senior Regulatory Counsel

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

August 15, 2003

RECEIVED-FPSC
03 AUG 15 PM 4: 34
COMMISSION
CLERK

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: **030349-TP (Supra \$75 Cash Back Promotion)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Exhibit DAN-RT-2 to David Nilson's Rebuttal Testimony filed by Supra on July 25, 2003. This exhibit contains BellSouth confidential information. We ask that you file this pleading 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.

RECEIVED & FILED
In
FPSC-BUREAU OF RECORDS

Sincerely,

E. Earl Edenfield, Jr.
(KA)

E. Earl Edenfield, Jr.

AUS _____
CAF _____
CMP _____ Enclosures
COM _____
CTR _____ cc: All Parties of Record
ECR _____ Marshall M. Criser III
GCL 1 _____ R. Douglas Lackey
OPC _____ Nancy B. White
MMS _____
SEC 1 _____
OTH _____
cc: cont records

This confidentiality request was filed by or for a "telco" for DN 07572-03. 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.
(See DN 06739-03)

DOCUMENT NUMBER-DATE

07571 AUG 15 03

FPSC-COMMISSION CLERK


**CERTIFICATE OF SERVICE
DOCKET NO. 030349-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 15th day of August, 2003 to the following:

Linda Dodson
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
ldodson@psc.state.fl.us

Adenet Medacier, Esq.
Jorge L. Cruz-Bustillo, Esq.,
Legal Department
Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel. No. (305) 476-4240
Fax. No. (305) 443-9516
amedacier@stis.com
jorge.cruz-bustillo@stis.com

Ann Shelfer, Esq.
Supra Telecommunications and
Information Systems, Inc.
1311 Executive Center Drive
Koger Center - Ellis Building
Suite 200
Tallahassee, FL 32301-5027
Tel. No. (850) 402-0510
Fax. No. (850) 402-0522
ashelfer@stis.com



E. Earl Edenfield, Jr. (EA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Supra Telecommunications)
and Information Systems, Inc., Against)
BellSouth Telecommunications, Inc.'s Regarding)
BellSouth's Use of Carrier to Carrier Information)
_____)

Docket No. 030349-TP

Filed: August 15, 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 this Request for Specified Confidential Classification.

1. On July 25, 2003, Supra Telecommunications and Information Systems, Inc., ("Supra") filed with the Florida Public Service Commission ("FPSC") the Rebuttal testimony and Exhibits of David A. Nilson. Said Exhibit DAN-RT-2 contains information which Supra understood contained BellSouth proprietary and confidential information. On July 25, 2003 Supra filed a Letter claiming confidentiality for Exhibit DAN-RT-2.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in Supra's Exhibit DAN-RT-2 is confidential pursuant to the terms of a former interconnection agreement and the rules of a commercial arbitration panel. 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 and would impair BellSouth's ability resolve matters via the Commercial Arbitration process. 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, proprietary business 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 document 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 15th day of August 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

(KA)

JAMES MEZA III.

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY

(KA)

E. EARL EDENFIELD JR.

General Attorneys

Suite 4300, BellSouth Center

675 West Peachtree Street, N.E.

Atlanta, Georgia 30375

(404) 335-0763

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030349-TP
Request for Confidential Classification
Page 1 of 1
08/15/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPRA'S EXHIBIT DAN-
RT-2 OF THE REBUTTAL TESTIMONY OF DAVID A. NILSON FILED IN FPSC
DOCKET 030349-TP ON JULY 25, 2003.**

Explanation of Proprietary Information

1. The subject information contains substantive reference to, or are documents from the BellSouth/Supra Commercial Arbitrations. Both BellSouth and Supra agreed to keep the information of the Commercial Arbitrations confidential. This information is proprietary to BellSouth and includes information containing customer proprietary and business proprietary information. The Commission has always zealously protected customer proprietary and business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

LOCATION

REASON

Entire Document

1