

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5558

September 12, 2003

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

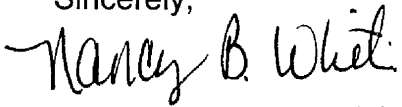
**Re: Docket No. 030869-TP: Petition by BellSouth Telecommunications,  
Inc. to Reduce its Network Access Charges Applicable to Intrastate  
Long Distance in a Revenue-Neutral manner**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s *Revised* Request for Specified Confidential Classification for its Exhibit DDC-1 to the testimony of Ms. Daonne Caldwell, 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,

  
Nancy B. White (KA)

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

DOCUMENT NUMBER DATE  
08670 SEP 12 8  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 030869-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(\*) Hand Delivery, Electronic Mail and Federal Express this 12th day of September,  
2003 to the following:

Beth Keating, Staff Counsel  
Felicia Banks, Staff Counsel  
Patricia Christensen, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)  
[pchrste@psc.state.fl.us](mailto:pchrste@psc.state.fl.us)

Charlie Beck (\*)  
Deputy Public Counsel  
Office of Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Fax No. (850) 488-4491  
[Beck.Charles@leg.state.fl.us](mailto:Beck.Charles@leg.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

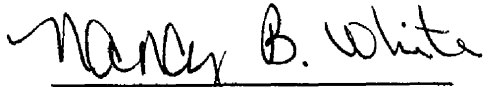
Richard A. Chapkis  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)

Verizon Florida, Inc.  
Ms. Michelle A. Robinson  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704  
Tel. No. (813) 483-2526  
Fax. No. (813) 223-4888  
[Michelle.Robinson@verizon.com](mailto:Michelle.Robinson@verizon.com)

Susan S. Masterton  
Charles J. Rehwinkel  
Sprint Comm. Co. LLP  
1313 Blair Stone Road (32301)  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
[Susan.masterton@mail.sprint.com](mailto:Susan.masterton@mail.sprint.com)  
[charles.j.rehwinkel@mail.sprint.com](mailto:charles.j.rehwinkel@mail.sprint.com)

John P. Fons  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 224-9115  
Fax. No. (850) 222-7560  
[jfons@ausley.com](mailto:jfons@ausley.com)

Michael B. Twomey  
Post Office Box 5256  
Tallahassee, Florida 32314-5256  
Tel. No. (850) 421-9530  
Fax No. (850) 421-8543  
Email: [miketwomey@talstar.com](mailto:miketwomey@talstar.com)

---

Nancy B. White      CKAD

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by BellSouth Telecommunications, )  
Inc., for Implementation of Section 364.164, )  
Florida Statutes )  
\_\_\_\_\_ )

Docket No.: 030869-TL

Filed: September 12, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REVISED REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR PERMANENT PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its *Revised* Request for Confidential Classification and Motion for Permanent Protective Order for exhibits to the testimony of Ms. Daonne Caldwell and states as follows:

1. On August 27, 2003, BellSouth filed its Request for Confidential Classification and Motion for Protective Order for exhibits to the testimony of Mr. Steve Bigelow and Ms. Daonne Caldwell.

2. A review of Exhibit DDC-1 to the testimony of Ms. Daonne Caldwell has necessitated filing this *Revised* Request for Confidential Classification and Motion for Protective Order to reflect the fact that BellSouth considers less information therein to be proprietary than originally sought. Mr. Steve Bigelow's information remains the same.

3. BellSouth deems the information in Exhibit DDC-1 to be confidential and proprietary business information in that it reflects cost studies of various services. Since competitors who will offer such services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

4. BellSouth has appended to this *Revised* Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

5. Appended hereto in an envelope designated as Attachment B are two copies of the information with the confidential information redacted.

6. Attached as Attachment C is a sealed envelope containing one copy of the information with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

7. This information is entitled to proprietary confidential classification for the following reasons. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in these interrogatories, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

8. BellSouth is filing this *Revised* Request for Confidential Classification and Motion for Permanent Protective Order so that the Commission Staff and the Office of

Public Counsel may receive copies of the complete filing made by BellSouth in the above captioned docket.

9. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above and contained in Exhibit DDC-1 to the testimony Daonne Caldwell to be confidential proprietary business information, and thus not subject to public disclosure.

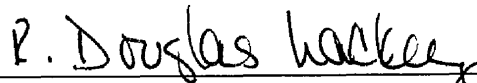
Respectfully submitted this 12th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



---

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



---

R. DOUGLAS LACKEY (KMS)  
MEREDITH MAYS  
675 W. Peachtree Street  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0750

**REVISED REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS TO  
THE TESTIMONY OF D.DAONNE CALDWELL AND STEVE BIGELOW FILED IN  
BELLSOUTH'S PETITION FOR IMPLEMENTATION OF SECTION 364.164,  
FLORIDA STATUTES.**

**Explanation of Proprietary Information**

1. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. BellSouth is not able to obtain its competitors' costs to provide service. Therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. For these reasons, the public disclosure of the information would impair the competitive business of BellSouth, and the information is, therefore, entitled to confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183 Florida Statutes and is exempt from the Open Records Act.
2. Some of this information includes prices negotiated by BellSouth with a specific vendor, Telcordia. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. Also, all of the information is proprietary to a vendor, Telcordia. This information relates to the SCIS (Switching Cost Information System) model developed by Telcordia. There is also information in the SNC (Switched Network Calculator) model of BellSouth that is derived from the SCIS. The SCIS is a model that Telcordia considers to be proprietary, and BellSouth is contractually bound by an agreement with Telcordia to treat it as such. This model incorporates information given to Telcordia by switch vendors, as well as programming algorithms developed by Telcordia to translate the switch vendor information into cost profiles for various applications. This computer model has been developed by Telcordia over the course of more than a decade at a cost of tens of millions of dollars. If any of this

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Revised Request for Confidential Classification  
Page 2 of 3  
09/12/03**

information were made publicly available, the value of Telcordia's model and the related services it provides would decrease dramatically. Accordingly, this information is also both competitively sensitive and a trade secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), (d) and (e), Florida Statutes and is exempt from the Open Records Act.

**LOCATION**

**REASON**

**CALDWELL'S EXHIBITS**

**DDC-1 (*Revised*)**

Section 1, Page 5, Column B,C, D, & E	1
Section 1, Page 6, Column B, C, D & E	1
Appendix A, Pages 1-6	1
Appendix B, Pages 1-6	1
Appendix J, Pages 1-10	1
and CDs of Basic Local service Study & BSTLM Loop Model	1
DDC-2 Page 1-2 (Column D, E, & F)	1
DDC-4 (Non-Recurring Cost Column)	1
SCIS model developed by Telcordia (Entire Document and CD)	2

**BIGELOW'S EXHIBITS**

**EXHIBIT SB1**

Page 1 of 13 through 5 of 13, Column 10, 11, & 12  
Page 6 of 13, Column 1,2 and 3  
Page 8 of 13 , column 10, 11, 12  
Page 9 of 13, column 1, 2, and 3  
Page 11 of 13, column 10, 11, 12  
Page 12 of 13, column 1, 2, and 3.



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**Revised Request for Confidential Classification**  
**Page 3 of 3**  
**09/12/03**

**EXHIBIT SB2**

Pages 1 of 13 – Page 5 of 13, Column 10, 11, & 12	1
Page 6 of 13, Column 1, 2, & 3.	1
Page 8 of 13, Column 10, 11, & 12	1
Page 9 of 13, Column 1, 2, & 3	1
Page 11 of 13, Column 10, 11, 12	1
Page 12 of 13, Column 1, 2, 3	1

**EXHIBIT SB3**

Page 1 of 67 , Column 11, 12, & 13	1
Page 4 of 67 – Page 57 of 67, Column 10, 11 & 12	1
Page 61 of 67 –Page 62 of 67, Column 10, 11, & 12	1
Page 65 of 67, Column 10, 11, & 12	1

**EXHIBIT SB4**

Page 1, Column 11, 12, & 13	1
-----------------------------	---