

ORIGINAL

Legal Department

JAMES MEZA III  
Attorney  
BellSouth Telecommunications, Inc.  
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Room 400  
Tallahassee, Florida 32301  
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September 12, 2003

RECEIVED FPSC  
03 SEP 12 PM 4:45  
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 its response to Staff's First Request for Production No. 1, 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,

*James Meza III*  
James Meza III (KA)

Enclosures

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

cc:  
cont records

This confidentiality request was filed by or for a "telco" for DN 08674-03. 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.  
(x-ref 07855-03)

DOCUMENT NUMBER-DATE

08673 SEP 12 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 12th day of September, 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  
Fax No. (850) 413-6217  
[ldodson@psc.state.fl.us](mailto:ldodson@psc.state.fl.us)

Adenet Medacier, Esq.  
Jorge L. Cruz-Bustillo, Esq,  
Legal Department  
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Fax. No. (305) 443-9516  
[amedacier@stis.com](mailto:amedacier@stis.com)  
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James Meza III (KA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by Supra Telecommunications ) Docket No. 030349-TP  
and Information Systems, Inc., against BellSouth )  
Telecommunications, Inc. regarding BellSouth's )  
alleged use of carrier to carrier information ) Filed: September 12, 2003  
\_\_\_\_\_)

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification and states as follows:

1. On August 22, 2003, BellSouth filed its response to Florida Public Service Commission Staff's ("Staff") First Request for Production of Documents. BellSouth's Response to Staff's Request for Production of Documents, Request No. 1 contains information that is proprietary and confidential to BellSouth. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Response to Staff's First Request for Production of Document, Request No. 1 includes confidential, proprietary information utilized by BellSouth 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 and provide competitors with an unfair advantage. 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 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'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 two redacted copies of the documents 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.

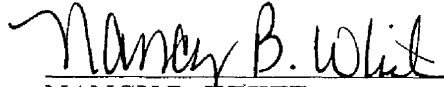
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

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 12th day of September 12, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (BA)

JAMES MEZA III

c/o Nancy Sims

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(305) 347-5558



E. Earl Edenfield, Jr. (BA)

R. DOUGLAS LACKEY (BA)

Suite 4300

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504487

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030349-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSE TO STAFF'S 1<sup>ST</sup> REQUEST FOR PRODUCTION OF DOCUMENTS,  
REQUEST NO. 1 FILED AUGUST 22, 2003,  
IN FLORIDA DOCKET NO. 030349-TP**

**Explanation of Proprietary Information**

1. This information constitutes proprietary confidential business information because it contains BellSouth's trade secrets and information relating to BellSouth's competitive interests. Specifically, the subject information relates to BellSouth's marketing efforts and procedures. Disclosure of this data would cause competitive harm to BellSouth. Consequently, 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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030349-TP  
Request for Confidential Classification  
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09/12/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
RESPONSE TO STAFF'S 1<sup>ST</sup> REQUEST FOR PRODUCTION OF DOCUMENTS,  
REQUEST NO. 1 FILED AUGUST 22, 2003, IN FLORIDA  
DOCKET NO. 030349-TP**

**PRODUCTION OF DOCUMENT REQUEST NO. 1**

Location

Entire Document

Reason

1