

Meredith E. Mays  
Senior Regulatory Counsel

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

October 10, 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. 030869-TL**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Citizens' 1<sup>st</sup> Set of Interrogatories, Attachment to Item No. 20, and 1<sup>st</sup> Request for Production of Documents, Item Nos. 2-5, 7, 11 and 18. Also enclosed is BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Attachment 2 provided in the Supplemental Responses to Item No. 6 to Citizens' 1<sup>st</sup> Set of Interrogatories, in the above referenced 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 (KM)

Enclosure

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

RECEIVED TELETYPE UNIT

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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 Electronic Mail, Hand Delivered\* and Federal Express this 10<sup>th</sup> day of October, 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)  
[pchriste@psc.state.fl.us](mailto:pchriste@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 (+)(\*)  
8903 Crawfordville Road  
Tallahassee, FL 32305  
Tel. No. (850) 421-9530  
Fax No. (850) 421-8543  
Email: [miketwomey@talstar.com](mailto:miketwomey@talstar.com)  
Represents AARP

Mark Cooper (+)  
504 Highgate Terrace  
Silver Spring, MD 20904  
Tel. No. (301) 384-2204  
Fax. No. (301) 236-0519  
[markcooper@aol.com](mailto:markcooper@aol.com)  
AARP Witness

  
Meredith E. Mays (cd)

**(+) Protective Agreement**  
**(\*) Hand Delivered**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by BellSouth Telecommunications, ) Docket No. 030869-TL  
Inc., to reduce its Network Access Charges )  
Applicable to Intrastate Long Distance in a )  
Revenue-Neutral Manner ) Filed: October 10, 2003

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

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, this Request For Specified Confidential Classification and states the following:

1. On September 18, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed and served its Responses to Citizens' First Set of Interrogatories and 1<sup>st</sup> Request for Production of Documents. Specifically, BellSouth served via overnight mail documents and CDs containing confidential information in response to Citizens' Production of Documents Item Nos. 2-5, 7, 11, 15, 18 and 19. BellSouth also served via overnight mail its confidential attachment to its response to Citizens' First Set of Interrogatories, No. 20. In addition, BellSouth filed a Notice of Intent to Request Specified Confidential Classification and a Motion for Temporary Protective Order with respect to BellSouth's response to Interrogatory No. 20 and Request for Production Nos. 2-5, 7, 11, 15, 18 and 19. When preparing this Request for Confidential Classification, it was discovered that the response to Citizens' First Request for Production Item No. 19 does not include proprietary information and therefore is not included in this Request for Confidential Classification. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for Interrogatory No. 20 and Request for Production Nos. 2-5, 7, 11,

15 and 18 as they contain proprietary confidential business information. A more specific description of this information is contained in Attachment A.

2. On September 22, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed and served its Supplemental Responses to Citizens' First Set of Interrogatories. Specifically, BellSouth served a Supplemental Response to Citizens' First Set of Interrogatories Item No. 6, Attachment 2 which contains confidential proprietary information. At that time, BellSouth filed a Notice of Intent to Request Specified Confidential Classification with respect to BellSouth's Supplemental Response to Interrogatory No. 6. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification as the attachment contains proprietary confidential business information. 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 10<sup>th</sup> day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (K4)

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

*R. Douglas Lackey*

R. DOUGLAS LACKEY (K4)

MEREDITH E. MAYS

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 337-0750

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030869-TL  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO CITIZENS' 1<sup>ST</sup> INTERROGATORIES, ITEM NO. 20  
AND REQUESTS FOR PRODUCTION ITEM NOS. 2-5, 7, 11, 15 AND 18  
FILED SEPTEMBER 18, 2003 AND  
SUPPLEMENTAL RESPONSE TO ITEM NO. 6  
ATTACHMENT 2 FILED SEPTEMBER 22, 2003**

**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 a competitive advantage in that they would know BellSouth's costs in providing certain services. Furthermore, the disclosure of this information would impair BellSouth's ability for goods and services because its competitors will know BellSouth's pricing and cost information and any respective analysis. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.
2. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause 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.
3. 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. This information was purchased from an individual marketing research firm, hired on behalf of BellSouth to conduct telecommunications market research. Therefore, such information is trade secret which 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. 030869-TL  
Request for Confidential Classification  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
RESPONSES TO CITIZENS' 1<sup>ST</sup> INTERROGATORIES, ITEM NO. 20  
AND REQUESTS FOR PRODUCTION ITEM NOS. 2-5, 7, 11, 15 & 18  
FILED SEPTEMBER 18, 2003 AND SUPPLEMENTAL RESPONSE TO ITEM NO. 6  
ATTACHMENT 2 FILED SEPTEMBER 22, 2003

**INTERROGATORY NO. 20**

<u>Location</u>	<u>Reason</u>
Entire Document	1

**PRODUCTION OF DOCUMENTS REQUEST NO. 2**

<u>Location</u>	<u>Reason</u>
Attachments 4-26 Entire Document	2
Entire CD	2

**PRODUCTION OF DOCUMENTS REQUEST NO. 3**

<u>Location</u>	<u>Reason</u>
Entire CD	2

**PRODUCTION OF DOCUMENTS REQUEST NO. 2-5,7, 11 & 18**

<u>Location</u>	<u>Reason</u>
Entire CD	2

**PRODUCTION OF DOCUMENTS REQUEST NO. 15**

<u>Location</u>	<u>Reason</u>
Entire Document	1

**PRODUCTION OF DOCUMENTS REQUEST NO. 7**

<u>Location</u>	<u>Reason</u>
Entire Document	3

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6**

<u>Location</u>	<u>Reason</u>
Entire Document	1