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November 19, 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-TP: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner**

**Docket No. 030867-TP: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes**

**Docket No. 030868-TP: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes**

**Docket No. 030961-TP: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification and Motion for Temporary Protective Order for its Rebuttal Testimony of Steve Bigelow, John Ruscilli, W. Bernard Shell proprietary Exhibit No. WBS-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,

  
Meredith E. Mays (EM)

Enclosure

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

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DOCUMENT IDENTIFICATION

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FPSC-0019, COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket Nos. 030867-TP, 030868, 030869-TL and 030961-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and Federal Express this 19<sup>th</sup> day of November, 2003 to the following:

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*Nancy B. White*

Nancy B. White (kb)

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes	)	Docket No. 030961-TP
	)	
	)	
In re: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes	)	Docket No. 030867-TL
	)	
	)	
In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes	)	Docket No. 030868-TL
	)	
	)	
In re: Petition by BellSouth Telecommunications, Inc., To Reduce Its Network Access Charges Applicable To Intrastate Long Distance in A Revenue-Neutral Manner	)	Docket No. 030869-TL
	)	
	)	
	)	Filed: November 19, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT  
TO REQUEST CONFIDENTIAL CLASSIFICATION AND MOTION  
FOR TEMPORARY PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Notice of Intent to Request Confidential Classification and pursuant to rule 25-22.006(5)(c), Florida Administrative code, its Motion for Temporary Protective Order.

1. On November 19, 2003, BellSouth filed its Rebuttal Testimony of Steve Bigelow, John Ruscilli, W. Bernard Shell, Dr. Andy Banerjee and Dr. Kenneth Gordon. BellSouth's Rebuttal Testimony for Steve Bigelow, John Ruscilli and W. Bernard Shell Exhibit No. WBS-1 contains proprietary confidential business information.

2. Because BellSouth's Rebuttal Testimony for Steve Bigelow, John Ruscilli and W. Bernard Shell Exhibit No. WBS-1 contain proprietary confidential business information, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification and Motion for Temporary Protective Order pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the documents without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

**MOTION FOR TEMPORARY PROTECTIVE ORDER**

BellSouth's Rebuttal Testimony for Steve Bigelow, John Ruscilli and W. Bernard Shell Exhibit No. WBS-1 contains proprietary confidential business information that should not be disclosed. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The Rebuttal Testimony for Steve Bigelow, John Ruscilli and W. Bernard Shell Exhibit No. WBS-1 contains, among other things, information relating to competitive interests, confidential financial information, and other proprietary confidential business information pursuant to § 364.183(3), Florida Statutes. If Counsel subsequently notifies BellSouth that any of the proprietary documents are to be used in a proceeding before the Commission, BellSouth will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing each of the documents identified.

Respectfully submitted this 19<sup>th</sup> day of November, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (KA)

c/o Nancy Sims

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