Meredith E. Mays Senior Regulatory Counsel

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

November 25, 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: <u>Docket No. 030869-TP</u>: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner

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

<u>Docket No. 030868-TP</u>: 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

<u>Docket No. 030961-TP</u>: 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 proprietary response to Interrogatory No. 81 and attachments to Interrogatory Nos. 89 and 90 to its Responses to Staff's Fourth Set of Interrogatories, 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.

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Meredith E. Mays

Enclosure

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White 514925

BLVO- E 16,474, LHEMT1000

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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 and FedEx this 25th day of November, 2003 to the following:

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Meredith Mays

(+) Protective Agreement

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-TI)
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) Docket No. 030869-TL
Revenue-Neutral Manner) Filed November 25, 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 25, 2003, BellSouth served its Responses to Staff's Fourth Set of Interrogatories, Nos. 81-90 of which the response to Interrogatory No. 81 and the attachments to Interrogatories No. 89 and 90 contain proprietary confidential business information.
- 2. Because BellSouth's response to Interrogatory No. 81 and the attachments to Interrogatories No. 89 and 90 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 response to Interrogatory No. 81 and the attachments to Interrogatories No. 89 and 90 to Staff's Fourth Set of Interrogatories contain 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 Pre-hearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The response to Interrogatory No. 81 and the attachments to Interrogatories Nos. 89 and 90 contain, among other things, information relating to competitive interests, confidential carrier 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 25th day of November, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

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