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December 2, 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 proprietary Response to Staff's Late-filed deposition exhibit of W. Bernard Shell, 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 (VA)

Enclosure
cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Nancy B. White
515624

DOCUMENT NUMBER-DATE
12257 DEC-2 8
FPSC-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 FedEx this 2nd day of December, 2003 to the following:

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Meredith Mays (IA)

(+) 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-TI
<hr/> 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
<hr/> 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
<hr/> 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: December 2, 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 December 2, 2003, BellSouth served its response to Staff's Late-filed deposition request for "Mileage for Common Transport" made during the November 25, 2003, deposition of W. Bernard Shell. This Late-filed response contains proprietary confidential business information.

2. Because BellSouth's Late-Filed deposition response contains 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 Staff's Late-filed deposition request for "Mileage for Common Transport" 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 Pre-hearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The response to Late-filed deposition request contains, 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 2nd day of December 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

c/o Nancy Sims

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