

Nancy B. White
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December 8, 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. 030851-TP

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Responses to Florida Competitive Carriers Associations (FCCA)'s First Set of Interrogatories Item Nos. 2, 3, 4, 5, 6, 10 and 12, 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,

Nancy B. White

Nancy B. White (WA)

Enclosure

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Meredith Mays
516655

This confidentiality request was filed by or for a "telco" for DN 12628-03. 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. 11551-03)

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03 DEC -8 PM 4:42
COMMISSION
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Confidential
DOCUMENT NUMBER-DATE
12628 DEC-8 8

Redacted
DOCUMENT NUMBER-DATE
12627 DEC-8 8

Request
DOCUMENT NUMBER-DATE

12626 DEC-8 8

FPSC-COMMISSION CLERK

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CERTIFICATE OF SERVICE
Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and FedEx® this 8th day of December 2003 to the following:

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Nancy B. White (VA)

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: December 8, 2003
_____)

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On November 17, 2003, BellSouth filed its response to the Florida Competitive Carriers Association (FCCA)'s First Interrogatories. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to FCCA's First Interrogatories, Item Nos. 2, 3, 4, 5, 6, 10 and 12.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Response to FCCA's First Interrogatories includes confidential business 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 the 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 redacted copies of the document 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 8th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

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c/o Nancy Sims

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
Page 1 of 3
12/8/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO FCCA'S 1ST INTERROGATORIES ITEM NOS. 2, 3, 4, 5, 6, 10 and 12 FILED
NOVEMBER 17, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

Explanation of Proprietary Information

1. 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
2. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network usage forecasts, network utilization data, network switch line growth/loss, and network trunk terminations. If this information were disclosed publicly, it could cause harm to BellSouth in its operations and would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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12/8/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO FCCA'S 1ST INTERROGATORIES ITEM NOS. 2, 3, 4, 5, 6, 10 and 12 FILED
NOVEMBER 17, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

INTERROGATORY, ITEM NO. 2-2

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Analog SPA (3 rd Column)	all pages (all nos.)	1
DS1 SPA (4 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 2-3

Last 3 Mos (3 rd Column)	all pages (all nos.)	1
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INTERROGATORY, ITEM NO. 3-1

Analog (3 rd column)	all pages (all nos.)	1
Other (4 th column)	all pages (all nos.)	1
DS1 (5 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 3-2

Analog SPA (3 rd Column)	all pages (all nos.)	1
DS1 SPA (4 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 3-3

Bus Combo (3 rd Column)	all pages (all nos.)	1
Res Combo (4 th Column)	all pages (all nos.)	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
Page 3 of 3
12/8/03

INTERROGATORY, ITEM NO. 4-1

Analog (3 rd column)	all pages (all nos.)	1
Other (4 th column)	all pages (all nos.)	1
DS1 (5 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 4-2

Analog SPA (3 rd Column)	all pages (all nos.)	1
DS1 SPA (4 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 4-3

Bus Combo (3 rd Column)	all pages (all nos.)	1
Res Combo (4 th Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 5-1

Retail Business Units (3 rd Column)	all pages (all nos.)	1
Retail Residence Units (4 th Column)	all pages (all nos.)	1
Total Retail Units (5 th Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 6-1

DS1 SPA (3 rd Column)	all pages (all nos.)	1
DS3 SPA (4 th Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 10-1

Locations (2 nd Column)	all pages (all nos.)	1
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INTERROGATORY, ITEM NO. 12-1

Entire Document		2
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