

MEREDITH E. MAYS  
Senior Regulatory Counsel

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

December 8, 2003

Ms. Blanca S. Bayó  
Director, Division of the Commission Clerk  
And Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-DIVISION  
03 DEC -8 PM 4:43  
COMMISSION  
CLERK

**Re: Docket No. 030300-TP (Petition of the Florida Public Telecommunications Association for Expedited Review of BellSouth Telecommunications Inc.'s Tariffs With Respect to Rates for Payphone Line Access, Usage, and Features)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Direct Testimony of Daonne D. Caldwell Exhibit Nos. DDC-1 and DDC-2, which we ask that you file in the captioned matter.

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*  
Meredith E. Mays (MAY)

This confidentiality request was filed by or for a "telco" for DN 12631-03. 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. 11558-03)

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC
- OTH \_\_\_\_\_

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

516793

*cc  
conf  
records*

*Request*      *Redacted*  
DOCUMENT NUMBER-DATE    DOCUMENT NUMBER-DATE  
12629 DEC-8      12630 DEC-8

FPSC-COMMISSION CLERK    FPSC-COMMISSION CLERK

*Confidential*  
DOCUMENT NUMBER-DATE  
12631 DEC-8  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030300-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and FedEx this 8<sup>th</sup> day of December , 2003 to the following:

Linda Dodson  
**Staff Counsel**  
David L. Dowds  
**Division of Competitive Markets &  
Enforcement**  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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*Meredith E. Mays*

Meredith E. Mays (DM)

**(+) signed Protective Agreement**

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re:	)	
	)	
Petition of Florida Public Telecommunications	)	Docket No. 030300-TP
Association for Expedited Review of	)	
BellSouth Telecommunications, Inc.'s Tariffs	)	Filed: December 8, 2003
With respect to Rates for Payphone Line Access,	)	
Usage, and Features	)	
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

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

1. On November 17, 2003, BellSouth Telecommunications, Inc. filed its Direct Testimony of Daonne D. Caldwell along with Exhibit Nos. DDC-1, DDC-2, and DDC-3 in this docket. BellSouth's Direct Testimony of Daonne D. Caldwell Exhibit Nos. DDC-1 and DDC-2 include confidential business information that is considered proprietary to BellSouth. In addition, on November 17, 2003 BellSouth filed a Notice of Intent to Request Specified Confidential Classification. Pursuant to Rule 25-22.06 (3)(a), BellSouth is now filing a Request for Confidential Classification with respect to Exhibits DDC-1 and DDC-2 as they contain confidential and proprietary business information in that it reflects cost studies of various services.

2. 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 since competitors who will offer such services can use

this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

3. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

4. Appended hereto in an envelope designated as Attachment B are two copies of the information with the confidential information redacted.

5. Attached as Attachment C is a sealed envelope containing one copy of the information with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

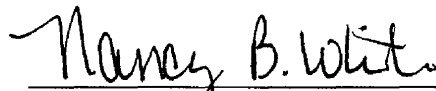
6. This information is entitled to proprietary confidential classification for the following reasons. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in these interrogatories, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

7. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

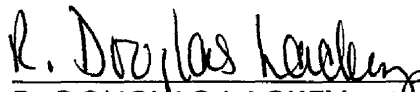
WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above and contained in Exhibit DDC-1 and DDC-2 to the testimony Daonne Caldwell to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 8<sup>th</sup> day of December 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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c/o Nancy H. Sims  
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(404) 335-0750

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC DOCKET 030300-TP  
Request for Confidential Classification  
Page 1  
12/8/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS DDC-1 AND DDC-2  
TO THE DIRECT TESTIMONY OF D. DAONNE CALDWELL FILED ON NOVEMBER  
17, 2003, IN FPSC DOCKET 030300-TP**

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available 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.

**LOCATION**

**REASON**

**DDC-1**

Bate Stamped Pages	
Page 000004, Lines 1(PTSA), 3(PTSA), 5(PTSA), & 7(PTSA)	1
Page 000011, Last Column	1
Page 000012, Recurring, ONA Factor, & Total Cost Columns	1
Pages 000014- 000088, 000090-000093	1

**DDC\_2**

Line 1(PTSA), 3(PTSA), 5(PTSA), & 7(PTSA)	1
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