

Meredith E. Mays
Senior Regulatory Counsel

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

December 9, 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 Request for Specified Confidential Classification for its proprietary Responses to Staff's Fourth Set of Interrogatories, attachment No. 81 and responses to 89 and 90, 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
Meredith E. Mays (KAB)

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

517022

DOCUMENT NUMBER DATE
12704 DEC 10 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 9th day of December, 2003 to the following:

Beth Keating, Staff Counsel *
Felicia Banks, Staff Counsel
Patricia Christensen, Staff Counsel
Lee Fordham, Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
bkeating@psc.state.fl.us
fbanks@psc.state.fl.us
pchriste@psc.state.fl.us
cfordham@psc.state.fl.us

Charlie Beck *
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax No. (850) 488-4491
Beck.Charles@leg.state.fl.us

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Richard A. Chapkis (+)
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
Richard.chapkis@verizon.com

Verizon Florida, Inc.
Ms. Michelle A. Robinson
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704
Tel. No. (813) 483-2526
Fax. No. (813) 223-4888
Michelle.Robinson@verizon.com

Susan S. Masterton
Charles J. Rehwinkel (+)
Sprint Comm. Co. LLP
1313 Blair Stone Road (32301)
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Attys. for Sprint LP
Susan.masterton@mail.sprint.com
charles.j.rehwinkel@mail.sprint.com

John P. Fons (+)
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
jfons@ausley.com

Michael B. Twomey (+)
8903 Crawfordville Road
Tallahassee, FL 32305
Tel. No. (850) 421-9530
Fax No. (850) 421-8543
Email: miketwomey@talstar.com
Represents AARP
Represents Common Cause
Represents Sugarmill Woods

Mark Cooper (+)
504 Highgate Terrace
Silver Spring, MD 20904
Tel. No. (301) 384-2204
Fax. No. (301) 236-0519
markcooper@aol.com
AARP Witness

Floyd Self, Esq. (+)
Messer, Caparello & Self, P.A.
215 South Monroe Street, Suite 701
Tallahassee, FL 32301
Tel. No. (850) 222-0720
Atty. for AT&T
Atty. for MCI (+)
fself@lawfla.com

Tracy W. Hatch (+)
AT&T Communications
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
thatch@att.com

Donna McNulty, Esq.
MCI WorldCom Comm., Inc.
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960
donna.mcnulty@mci.com

George Meros
Gray Robinson, P.A.
301 S. Bronough St., Suite 600
Tallahassee, FL 32301
Mail: P.O. Box 11189
Tallahassee, FL 32302-3189
Tel. No. (850) 577-9090
Fax. No. (850) 577-3311
GMeros@gray-robinson.com

John Feehan
Knology, Inc.
1241 O.G. Skinner Drive
West Point, Georgia 31833
Tel. No. (706) 634-2828
Fax. No. (706) 645-0148
john.feehan@knology.com

Charles J. Christ, Jr.
Jack Shreve
Office of the Attorney General
PL-01 The Capitol
Tallahassee, Florida 32399-1050
Tel. No. (850) 414-3300
Fax. No. (850) 410-2672
ag@oag.state.fl.us

Harris R. Anthony
BellSouth Long Distance, Inc.
400 Perimeter Center Terrace
Suite 350
Atlanta, GA 30346
Tel. No. (770) 352-3116
harris.anthony@bellsouth.com

Ben Wilcox
Executive Director
Common Cause Florida
704 West Madison Street
Tallahassee, FL 32304
Tel. No. (850) 222-3883
Fax. No. (850) 222-3906
cmncause@infionline.net



Meredith Mays (CA)

(+) 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))))
<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 9, 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 this Request for Specified Confidential Classification.

1. On November 25, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed and served its Responses to Staff's Fourth Set of Interrogatories. Specifically, BellSouth served via overnight mail documents containing confidential information in response to Staff Interrogatory Items 81-90. BellSouth also served via overnight mail its confidential response to Interrogatory No. 81 and attachment to its response to Staff's Fourth Set of Interrogatories, No. 89 and 90. In

addition, BellSouth filed a Notice of Intent to Request Specified Confidential Classification and a Motion for Temporary Protective Order with respect to BellSouth's response to Interrogatory No. 81 and attachment to Interrogatories 89 and 90. When preparing this Request for Confidential Classification, it was discovered that the attachment to Staff's Fourth Set of Interrogatories Item No. 90 does not include proprietary information and therefore is not included in this Request for Confidential Classification. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for Interrogatory No. 81 and the attachment to Interrogatory Item 89 as they contain competitive business marketing information and proprietary confidential business information. A more specific description of this information is contained in Attachment A.

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.

3. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

4. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 9th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY (KA)

MEREDITH E. MAYS

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 337-0750

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSES
TO STAFF'S FOURTH SET OF INTERROGATORIES, ITEM NO. 81
AND ATTACHMENT TO INTERROGATORY ITEM NO. 89 AS FILED IN FPSC
DOCKETS 030867-TL, 030868-TL, 030869, AND 030961-TI ON NOVEMBER 25, 2003**

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. 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

INTERROGATORY NO. 81

Line 2

1

INTERROGATORY NO.89

Attachment –Entire Document (Pages 1-3)

1