

Meredith E. Mays  
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and

HARRIS B. ANTHONY  
BellSouth Long Distance, Inc.  
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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 and Motion for Permanent Protective Order for its proprietary supplemental response to OPC's Third Set of Interrogatories No. 25, 27, 39, 41, 42, 43, 46 and 47 and Second Request for Production of Documents, No. 26, and BellSouth's Long Distance Inc. response to OPC's Second Request for Production of Documents, 26, 27, and 28, 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

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

December 9, 2003

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filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Meredith E. Mays". The signature is written in a cursive style with a large, stylized "M" and "E".

Meredith E. Mays (VA)  
Harris Anthony

Enclosure

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

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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, Hand Delivery\* and FedEx this 9<sup>th</sup> day of December, 2003 to the following:

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Nancy B. White (KA)

**(+) 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-TL
<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
<hr/>	)	Filed: December 9, 2003

**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, hereby files its Request for Specified Confidential Classification.

1. On December 9, 2003, BellSouth filed its supplemental responses to the Office of Public Counsel ("OPC")'s Second Set of Interrogatories, Second Request for Production, and Third Set of Interrogatories in this docket. Responsive information provided in BellSouth's responses are considered proprietary, confidential business information and should not be disclosed.

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 Responses to

OPC's Second and Third Set of Interrogatories, Nos. 25, 27,39, 41,42, 43, 46 and 47 and Second Request for Production, Nos. 26, 27 and 28 include 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.

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 9<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (KA)

c/o Nancy Sims

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030867-TL, 030868-TL  
030869-TL and 030961-TL  
Request for Confidential Classification  
Page 1 of 4  
12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE  
TO OPC'S SECOND AND THIRD SET OF INTERROGATORIES (NOS. 25, 27, 39, 41,  
42, 43, 46 and 47) AND THIRD REQUEST FOR PRODUCTION (NOS. 26, 27 and 28)  
FILED DECEMBER 9, 2003 IN  
FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL**

**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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030867-TL, 030868-TL  
030869-TL and 030961-TL  
Request for Confidential Classification  
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12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE  
TO OPC'S SECOND AND THIRD SET OF INTERROGATORIES (NOS. 25, 27, 39, 41,  
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FILED DECEMBER 9, 2003 IN  
FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL**

**INTERROGATORY, ITEM NO. 25 ATTACHMENT**

<u>Location</u>	<u>Reason</u>
MTS Column 2 <sup>nd</sup> Column (all numbers)	1
OCP Column 3 <sup>rd</sup> Column (all numbers)	1

**INTERROGATORY, ITEM NO. 27**

5 <sup>th</sup> Line of Response	1
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**INTERROGATORY, ITEM NO. 39**

Response Items: Columns:

Dec.31, 2001 (all numbers)	1
Dec. 31, 2002 (all numbers)	1
Aug 31, 2003 (all numbers)	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030867-TL, 030868-TL  
030869-TL and 030961-TL  
Request for Confidential Classification  
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12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
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42, 43, 46 and 47) AND THIRD REQUEST FOR PRODUCTION (NOS. 26, 27 and 28)  
FILED DECEMBER 9, 2003 IN  
FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL**

**INTERROGATORY, ITEM NO. 41 ATTACHMENT**

Columns :	2001 Jan	2001 May	2001 Sept	1
	2001 Feb	2001 Jun	2001 Oct	
	2001 Mar	2001 Jul	2001 Nov	
	2001 Apr	2001 Aug	2001 Dec	
	2001 Ann	2002 Jan	2002 Feb	
	2002 Mar	2002 Apr	2002 May	
	2002 Jun	2002 Jul	2002 Aug	
	2002 Sep	2002 Oct	2002 Nov	
	2002 Dec	2002 Ann	2003 Jan	
	2003 Feb	2003 Mar	2003 Apr	
	2003 May	2003 Jun	2003 Jul	
	2003 Aug	2003 Sep	2003 Oct	
	2003 Nov	2003 Dec	2003 Ann	

**INTERROGATORY, ITEM NO. 42 ATTACHMENT**

Table 1 Columns Jan-Dec (all numbers)	1
Table 2 Columns Jan-Dec (all numbers)	1

**INTERROGATORY, ITEM NO. 43 ATTACHMENT**

Entire Document	1
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030867-TL, 030868-TL  
030869-TL and 030961-TL  
Request for Confidential Classification  
Page 4 of 4  
12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE  
TO OPC'S SECOND AND THIRD SET OF INTERROGATORIES (NOs. 25, 27, 39, 41,  
42, 43, 46 and 47) AND THIRD REQUEST FOR PRODUCTION (NOS. 26, 27 and 28)  
FILED DECEMBER 9, 2003 IN  
FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL**

**INTERROGATORY, ITEM NO. 46**

Response :

1

- (a) Year 2001 (number)
- Year 2002 (number)
- YTD 8/03 (number)
- (b) Year 2001 (number)
- Year 2002 (number)
- YTD 8/03 (number)
- (c) Year 2001 (number)
- Year 2002 (number)
- YTD 8/03 (number)

1

**INTERROGATORY, ITEM NO. 47**

Response: 2001 Column, 2002 Column YTD Column

1

**POD NO. 26 – CD ROM**

BST CD Rom Entire CD

1

**POD NO. 26, 27 and 28**

BellSouth Long Distance CD Rom  
Entire CD

1