

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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12/10/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
SUPPLEMENTAL RESPONSE TO COVAD'S 1ST INTERROGATORIES NO. 3 FILED
DECEMBER 10, 2003, IN FLORIDA DOCKET NO. 030851-TP**

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FPSC-COMMUNICATIONS

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 030851-TP
Covad's 1st Interrogatories
November 5, 2003
SUPPLEMENTAL Item No. 3
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PUBLIC

REQUEST: What is the most recently calculated average churn rate for customers subscribing to each of the service categories listed in Interrogatory No. 2, subpart (a) through (i) in Florida?

RESPONSE: BellSouth objects to this Interrogatory on grounds that the information is (not reasonably calculated to lead to the discovery of admissible evidence 2 and it is not relevant to the subject matter of this action. BellSouth also 3 objects to this Interrogatory on grounds that it is unduly burdensome, 4 overly broad, and oppressive as written. Subject to these objections, and 5 without waiving these objections, monthly average churn among BellSouth 6 small business customers has been approximately ****%*** to 7 approximately ****%*** from June 2002 through June 2003. For BellSouth 8 residential customers, monthly churn varies by product, and BellSouth 9 does not track churn for all products. However, for BellSouth residential 10 customers who subscribe to Complete Choice (stand alone), monthly 11 average churn has been on the order of approximately ****%*** to 12 approximately ****%***. Churn for single lines is generally lower. This 13 information is proprietary and is being provided subject to the protective 14 agreement executed by the parties. 15