ORIGINAL

Legal Department

Nancy B. White General Counsel-Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 305 347-5558

December 12, 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 COMMISSION

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Notice of Intent to Request Confidential Classification for its Supplemental Responses to MCI's First Set of Interrogatories (Nos. 1-195) and First Request for Production of Documents (No. 1) responsive attachments to Interrogatories Nos. 6 and 98, in the above referenced docket which we ask that you file.

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.

RECEIVED & FILED FAU OF RECORDS

Enclosure

cc: All Parties of Record AUS CAF Marshall M. Criser III CMP R. Douglas Lackey COM Meredith Mays CTR ECR 516131 GCL OPC MMS SEC OTH Icouf records

Sincerely,

Nancy B. White (CM)

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 2966-03. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER - DATE

12965 DEC 128

FPSC-COMMISSION CLERK

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 12th day of December 2003 to the

following:

4 .

2.

Adam Teitzman, Staff Counsel* Jason Rojas, Staff Counsel Jeremy Susac, 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 <u>ateitzma@psc.state.fl.us</u> jrojas@psc.state.fl.us jsusac@psc.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

Joseph A. McGlothlin + Vicki Gordon Kaufman~ + McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold PA 117 South Gadsden Street Tallahassee, FL 32301 Tel. No. (850) 222-2525 Fax. No. (850) 222-5606 Represents FCCA Represents Covad ~ imcglothlin@mac-law.com vkaufman@mac-law.com Charles E. Watkins + Covad Communications Company 1230 Peachtree Street, N.E. 19th Floor Atlanta, Georgia 30309 Tel. No. (404) 942-3492 Fax. No.(404) 942-3495 gwatkins@covad.com jbell@covad.com

Nanette Edwards, Esq.+ Director – Regulatory ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802 Tel. No. (256) 382-3856 nedwards@itcdeltacom.com

Floyd Self, Esq. + Norman H. Horton, Esq. ~ Messer Caparello & Self 215 South Monroe Street, Suite 701 Tallahassee, FL 32301 Tel. No. (850) 222-0720 Fax. No. (850) 224-4359 Represents ITC^DeltaCom, Represents KMC Represents MCI Represents Xspedius~ <u>fself@lawfla.com</u> nhorton@lawfla.com De O'Roark, Esq. + MCI WorldCom Communications, Inc. 6 Concourse Parkway, Suite 3200 Atlanta, GA 30328 <u>de.oroark@mci.com</u>

۹,

Jon Moyle, Jr. Moyle Law Firm (Tall) The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: 681-8788 Email: jmoylejr@moylelaw.com

Andrew O. Isar Miller Isar, Inc. 7901 Skansie Avenue Suite 240 Gig Harbor, WA 98335 Tel. No. (253) 851-6700 Fax No. (253) 851-6474 <u>aisar@millerisar.com</u>

Jason Spinard, Esq. Rand Currier Geoff Cookman Granite Telecommunications, LLC 234 Copeland Street Quincy, MA 02169 Tel. No. 617 847-1500 Fax No. 617 847-0931 jspinard@granitenet.com rcurrier@granitenet.com gcookman@granitenet.com

Donna McNulty, Esq. + MCI WorldCom Communications, Inc. 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 donna.mcnulty@mci.com Tracy Hatch, Esq. AT&T 101 North Monroe Street Suite 700 Tallahassee, FL 32301 Tel. No. (850) 425-6360 thatch@att.com

Lisa A. Sapper + AT&T 1200 Peachtree Street, N.E. Suite 8100 Atlanta, GA 30309 Tel. No. (404) 810-7812 <u>lisariley@att.com</u>

Jake E. Jennings + NewSouth Communications Corp Two North Main Center Greenville, SC 29601-2719 Tel. No. 864 672-5877 Fax No. 864 672-5313 jejennings@newsouth.com

Marva Brown Johnson, Esq. KMC Telecom III, LLC 1755 North Brown Road Lawrenceville, GA 30034-8119 marva.johnson@kmctelecom.com

Susan S. Masterton, Esq. + Sprint-Florida, Inc. Sprint Communications Co. L.P. 1313 Blair Stone Road P.O. Box 2214 Tallahassee, FL 32316-2214 Tel. No. (850) 599-1560 Fax. No. (850) 878-0777 susan.masterton@mail.sprint.com

Jeffrey J. Binder Allegiance Telecom of Florida, Inc. 1919 M Street, N.W. Washington, DC 20037 Tel. No (202) 464-1792 Jeff.binder@algx.com Terry Larkin Allegiance Telecom, Inc. 700 East Butterfield Road Lombard, IL 60148 Phone: (630) 522-6453 terry.larkin@algx.com

Jean Houck Business Telecom, Inc. 4300 Six Forks Road Raleigh, NC 27609 Tel. No. (919) 863-7325 jean.houck@btitelecom.net

Jonathan Audu Manager, Regulatory Affairs Supra Telecommunications 1311 Executive Center Drive Suite 220 Tallahassee, FL 32301-5027 Tel. No. (850) 402-0510 Fax. No. (850) 402-0522 jonathan.audu@stis.com

Margaret Ring, Director Regulatory Affairs Network Telephone Corporation 815 S. Palafox St. Pensacola, FL 32501 850-465-1748 Margaret.Ring@networktelephone.net

Tier 3 Communications Kim Brown 2235 First Street, Suite 217 Ft. Myers, FL 33901-2981 Phone: (239) 689-0000 Fax: (239) 689-0001 Email: <u>steve@tier3communications.net</u> Jorge Cruz-Bustillo + Assistant General Counsel Supra Telecommunications & Information Systems, Inc. 2620 S.W. 27th Avenue Miami, FL 33133 Phone: (305) 476-4252 Fax: (305) 443-1078 jorge.cruz-bustillo@stis.com

AT&T by E-Mail only: + soniadaniels@att.com

Richard Chapkis/Kimberly Caswell Verizon Florida Inc. P.O. Box 110, FLTC0007 Tampa, FL 33601-0110 Phone: (813) 483-1256 Fax: (813) 273-9825 Email: richard.chapkis@verizon.com

Matthew Feil (+) Scott Kassman FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801-1640 Tel. No. 407 835-0460 Fax No. 407 835-0309 <u>mfeil@mail.fdn.com</u> <u>skassman@mail.fdn.com</u>

Thomas M. Koutsky Vice President, Law and Public Policy Z-Tel Communications, Inc. 1200 19th Street, N.W., Ste. 500 Washington, D.C. 20036 Tel. No. (202) 955-9653 tkoutsky@z-tel.com

Nancy B White

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



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

)) Docket No. 030851-TP)) Filed: December 12, 2003

BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On December 12, 2003, BellSouth Telecommunications, Inc. filed its Supplemental Responses to MCI First Set of Interrogatories (Nos. 1-195) and First Request for Production of Documents No. 1 in this docket. BellSouth's attachments to its Supplemental Responses to MCI First Request for Production of Documents No. 1 responsive attachments to Interrogatories Nos. 6 and 98 include confidential business information that is considered proprietary to BellSouth.

2. Because this information contains proprietary information, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of these responses without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on

> 12965 DEC 128 FPSC-COMMISSION CLERK

all parties of record. BellSouth will be filing a Request for Confidential Classification

within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 12th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

JAMES MEZA III c/o Nancy H. Sims 150 South Monroe Street Suite 400 Tallahassee, FL 32301 (305) 347-5558

R. DOUGLAS PACKEY MEREDITH E. MAYS ANDREW D. SHORE Suite 4300, BellSouth Center 675 West Peachtree Street, N.E. Atlanta, GA 30375 (404) 335-0750

514291

×.

Supplemental Response

BellSouth Telecommunications, Inc.

MCI/WorldCom's 1st Request for Production of Documents

Item No. 1

Bates Pages

BST000001 - BST000051

Proprietary

Public Disclosure Document

BellSouth Telecommunications, Inc.

MCI/WorldCom's 1st Request for Production of Documents

Item No. 1

Attachment to Interrogatory Item No. 19

'n

K,

Public Disclosure Document

BST000052 Supplement

BELLSOUTH TELECOMMUNICATIONS JOB BRIEFS AND QUALIFICATIONS

Job Title:	Electronic Technician
Job Title Code:	9115
Wage Scale:	32

A. JOB RESPONSIBILITIES

Responsibilities may include but are not limited to the following:

- 1. Works alone and with other employees in testing, adjusting and/or repairing central office equipment and facilities used in providing high quality network switching, trunking, and special services. Some examples of special services are: telephone, program (audio), video, foreign central office and exchange service, high speed data, packet switching, etc.
- 2. Makes routine tests on switching systems equipment, facilities, trunks and special service circuits to insure a high quality of service.
- 3. Analyzes defects, tests, repairs and maintains telephone switching circuits and equipment in Company central offices, remote repeater locations, and administrative buildings by using various test equipment. Makes necessary repairs to equipment and facilities indicated by trouble reports, routine tests and alarms.
- 4. Coordinates work operations with other employees required to make routine tests and repair equipment or facilities. Coordinates the installation, rearrangement and disconnection of plain old telephone service (POTS), trunks and special services.
- 5. Reviews and interprets service, circuit diagrams, layout records, or other technical documents (i.e., WORD documents), and follows standard practices for provisioning special services, carrier, and message circuit orders. Reviews and analyzes complex schematic drawings in performing work operations.
- 6. Installs, repairs and adjusts equipment such as switches, routers, modems, relays and amplifiers using hand tools.
- 7. Performs routine equipment maintenance such as inspecting, cleaning, testing and lubricating equipment.
- 8. Removes or places connections on wire distributing frames and connects wire to terminal lugs, following work orders and specifications.
- 9. Maintains the integrity of mechanized and manual records on facility and equipment assignments for POTS, trunks and special services. Also, maintains records required for trouble reports, routine tests, trouble clearance and work activities.

A. JOB RESPONSIBILITIES (Continued)

2

- 10. Uses computer terminals associated with Operations Support Systems related to work operations.
- 11. Maintains telephone switching equipment at both private establishments (hotels and office buildings) and at other than regularly assigned central offices, which may require driving a Company vehicle between locations.
- 12. Tests, analyzes, corrects and/or repairs trouble reports and provides close-out to subscriber trouble reports.
- 13. Installs and performs hardware maintenance on a variety of computer systems, computer peripherals, and ancillary associated equipment.
- 14. Performs periodic preventive maintenance on computer systems through the use of sophisticated test equipment, software diagnostics.
- 15. Maintains computer systems including software back-ups in other departments.
- 16. Makes necessary tests for toxic and explosive gas before entering cable vaults and underground controlled environment vaults (CEVs) and continues tests while working in area.
- 17. Works with hot metal in some assignments, works with color coded and tone identified wires associated with the installation, maintenance and repair of carrier facilities.
- 18. Determines differences between wire and cable colors associated with equipment.
- 19. Works aloft on ladders with hand tools and test sets.
- 20. Follows established safety practices and procedures. Must be able to safely utilize equipment resources to perform specified physical job duties, i.e., satisfies manufacturer's specifications for operation or use of equipment including weight limitations.
- 21. Lifts and moves loads up to 100 pounds.
- 22. Cleans and sweeps up loose wire and other debris.
- 23. Drives Company vehicle.

Job Created: August 1986 Date Revised: November 1997 BST000054 Supplement

A. JOB RESPONSIBILITIES (Continued)

- 24. Places and removes plug-in equipment.
- 25. Tests wire work performed to assure reliable service and to identify troubles.
- 26. Repairs and performs routine maintenance such as inspecting, cleaning, and testing of large batteries, rectifiers, converters, inverters, and operates emergency engines.

B. BASIC QUALIFICATIONS Candidates must meet the following minimum qualifications:			
Testing	Training	Other Requirements	
See Non-Management Job Title Test Matrix and Test Study Guides (www.asisvcs.com/bellsouth/testtip s.html)	 The following must be satisfactorily completed for title retention: ✓ On-the-job and/or classroom training as required ✓ SS508 Principals of Digital Transmission Systems 	 Satisfactory performance and attendance in present job. Satisfactory background investigation. Valid driver's license and ability to drive vehicle with manual shift in some assignments. Ability to perceive differences in wire and cable colors. Ability to differentiate between audible tones. 	

C. GENERAL WORKING CONDITIONS/PHYSICAL REQUIREMENTS Successful candidates require the ability to:

- Work various scheduled tours including day, evening and night, covering Sunday through Saturday with overtime, call-outs and holiday work as required. Tour length will be 8 hours.
- Work alone at remote repeater locations and/or in controlled environment vaults or in a work center environment.
- Work aloft on ladders with hand tools and test sets; and lift and move loads up to 100 pounds.

D. ADDITIONAL FACTORS TO BE CONSIDERED

✓ Experience in electrical, electronic or mechanical field.

Individuals holding this job title may be required to perform the above job duties with or without "reasonable accommodations."

-3-Public Disclosure Document Job Created: August 1986 Date Revised: November 1997 BST000055 Supplement

BELLSOUTH TELECOMMUNICATIONS JOB BRIEFS AND QUALIFICATIONS

Job Title: Job Title Code: Wage Scale:

Frame Attendant 1461 24

A. JOB RESPONSIBILITIES

Responsibilities may include but are not limited to the following:

- 1. Reviews and interprets service orders or equivalent and follows standard practices.
- 2. Connects, disconnects, removes, rearranges and maintains wires inside a central office connecting customers' lines with central office equipment.
- 3. Determines differences in wire and cable colors.
- 4. Completes work by using hand tools such as pliers, screwdriver, soldering iron and special test equipment.
- 5. Climbs ladders and performs work assignments aloft.
- 6. Pulls wire and carries test equipment, wire coils and associated equipment weighing up to 60 pounds.
- 7. Determines work to be done by reviewing service orders and other Company issued documents.
- 8. Makes or assists other craft employees in making tests and checks of equipment.
- 9. Routinely inspects all parts of the frames.
- 10. Cleans and sweeps up loose wire and other debris.
- 11. Works alone or with others in a large room with narrow aisles crowded with rows of frame and switching equipment.
- 12. Places and removes plug-in circuit equipment.
- 13. Maintains integrity of mechanized and manual records on facility and equipment assignments for plain old telephone service (POTS); and performs data base verifications using computer terminal associated with Operations Support Systems.
- 14. Tests wire work performed to assure reliable service and identify troubles; tests and analyzes frame trouble reports; corrects or repairs trouble and closes out reports to subscribers.

Public Disclosure Document

Job Created: November 1972 Date Revised: November 1997 BST000056 Supplement

A. JOB RESPONSIBILITIES (Continued)

- 15. Handles permanent signals and calling party hold alarms; changes mechanized tapes in some assignments.
- Follows established safety practices and procedures. Must be able to safely utilize equipment resources to perform specified physical job duties, i.e., satisfies manufacturer's specifications for operation or use of equipment including weight limitations.
- 17. Drives Company vehicle.

Testing	Training	Other Requirements
See Non-Management Job Title Test Matrix and Test Study Guides (www.asisvcs.com/bellsouth/testtip s.html)	 The following must be satisfactorily completed for title retention: ✓ On-the-job and/or classroom training as required 	 Satisfactory performance and attendance in preser job. Satisfactory background investigation. Valid driver's license and ability to drive vehicle with manual shift in some assignments. Ability to perceive differences in wire and cable colors.

C. GENERAL WORKING CONDITIONS/PHYSICAL REQUIREMENTS Successful candidates require the ability to:

- Work various scheduled tours including day, evening and night covering Sunday through Saturday with overtime, call-outs and holiday work as required. Tour length will be 8 hours.
- Work alone or with others in a large room with narrow aisles crowded with rows of frame equipment.
- ✓ Climb ladders, work aloft, and lift and move equipment weighing up to 60 pounds.

D. ADDITIONAL FACTORS TO BE CONSIDERED

Knowledge of service orders.

Individuals holding this job title may be required to perform the above job duties with or without "reasonable accommodations."

Job Created: November 1972 Date Revised: November 1997 BST000057 Supplement **Supplemental Response**

.

BellSouth Telecommunications, Inc.

MCI/WorldCom's 1st Request for Production of Documents

Item No. 1

Bates Pages

BST000058 - BST000983

Proprietary

Public Disclosure Document