

LISA FOSHEE  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0754

December 16, 2003

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

**Re: Docket No.: 030945-TP  
Complaint of DIECA Communications, Inc., d/b/a Covad Communications  
Company Against BellSouth Telecommunications, Inc. for Breach of the  
Parties' Interconnection Agreement and Unauthorized Discontinuance of  
Service to Customers, Request for Maintenance of the Status Quo, and  
Request for Expedited Relief**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its responses to Staff's Data Requests (Item No. 5), 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,



Lisa Spooner Foshee

(KA)

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

DOCUMENT NUMBER DATE  
13096 DEC 16 8  
FPSC-COMMISSION CLERK

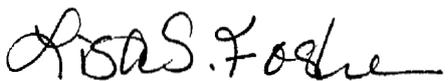
**CERTIFICATE OF SERVICE**  
**Docket No. 030945-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 16th day of December 2003 to the following:

Rosanne Gervasi  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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Fax No. (404) 942-3495  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

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McWhirter Reeves McGlothlin Davidson  
Kaufman & Arnold, P.A.  
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[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

  
\_\_\_\_\_  
Lisa S. Foshee (LH)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of DIECA Communications, Inc., d/b/a )  
Covad Communications Company against BellSouth ) Dkt No. 030945-TP  
Telecommunications, Inc. for Breach of the Parties' )  
Interconnection Agreement and Unauthorized Discontinuance )  
Of Service to Customers, Request for Maintenance of ) Filed December 16, 2003  
Status Quo, and Request for Expedited Relief. )

**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 its Request for Specified Confidential Classification.

BellSouth Telecommunications, Inc. ("BellSouth"), files, pursuant to Rule 25-22.006, Florida Administrative Code, this Request for Specified Confidential Classification and states the following:

1. On November 25, 2003, BellSouth filed responses to Staff's Data Requests in the Complaint of DIECA Communications Inc. ("Covad" Communications). At that time BellSouth filed a Notice of Intent to Request Specified Confidential Classification. BellSouth's response to Item No. 5 contains confidential business information that is proprietary to BellSouth.

2. 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.

3. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the document containing the confidential information.

4. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

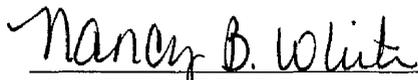
5. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

6. 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 16<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



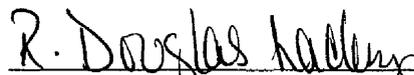
NANCY B. WHITE (CA)

c/o Nancy Sims

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(305) 347-5558



R. DOUGLAS LACKEY (CA)

MEREDITH E. MAYS

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Dkt. No. 030945-TP  
Staff's Data Requests – Covad Complaint  
Request for Confidential Classification  
Page 1 of 2  
12/16//03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO STAFF'S DATA REQUESTS, ATTACHMENT TO ITEM NO. 5  
FILED NOVEMBER 25, 2003**

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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Dkt. No. 030945-TP  
Staff's Data Requests – Covad Complaint  
Request for Confidential Classification  
Page 2 of 2  
12/16/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO STAFF'S DATA REQUESTS, ATTACHMENT TO ITEM NO. 5  
FILED NOVEMBER 25, 2003**

**ATTACHMENT TO ITEM NO. 5**

Location

Reason

Text in first line of every paragraph

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