

ORIGINAL

Legal Department

Nancy B. White
General Counsel-Florida

BellSouth Telecommunications, Inc.
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January 20, 2004

RECEIVED-FPSC
04 JAN 20 PM 4: 31
COMMISSION
CLERK

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. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Responses to AT&T's Third Request for Production of Documents, Item Nos. 41, 42, 44, 48, 49, 53 and 54, in the above referenced 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,

Nancy B. White
Nancy B. White *(EM)*

Enclosure

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Meredith Mays

522674

This confidentiality request was filed by or for a "telco" for DN 00836-04 No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 13573-03 + 00557-04)

AUS
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conf records

Request
DOCUMENT NUMBER-DATE
00834 JAN 20 04
FPSC-COMMISSION CLERK

Redacted
DOCUMENT NUMBER-DATE
00835 JAN 20 04
FPSC-COMMISSION CLERK

Confidential
DOCUMENT NUMBER-DATE
00836 JAN 20 04
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 20th day of January 2004 to the following:

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: January 20, 2004
_____)

**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.

1. On December 30, 2003, BellSouth filed its response to AT&T Communications of the Southern States, LLC's ("AT&T") Third Set of Interrogatories and Third Requests for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to AT&T's Third Requests for Production, Item Nos. 41, 42, 44, 48, 49, 53, and 54.

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 Response to AT&T's Third Requests for Production of Documents includes 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

pursuant to Section 364.24 and Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

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 20th day of January, 2004 .

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in cursive that reads "Nancy B. White" followed by a circled "R" or "RW".

NANCY B. WHITE

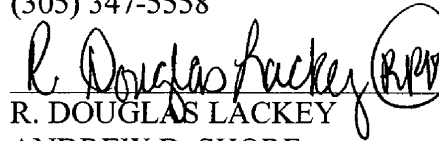
JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

A handwritten signature in cursive that reads "R. Douglas Lackey" followed by a circled "R" or "RL".

R. DOUGLAS LACKEY

ANDREW D. SHORE

MEREDITH MAYS

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0750

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

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 includes salary information for BellSouth personnel and churn rates. 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.
2. This information contains competitive business information. The subject information relates to force sizing models. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), Florida Statutes and is exempt from the Open Records Act.
3. This information concerns competitive business information. Specifically, this information reflects Agreements entered into by and between BellSouth and other companies and competitive agent program analysis. Therefore, this information should be classified as proprietary, confidential business information and is exempt from disclosure pursuant to Section 364.183 (3)(e).

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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01/20/04

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP

REQUEST FOR PRODUCTION, ITEM NO. 41

<u>Location</u>	<u>Reason</u>
All pages, all numbers, all percentages	2

REQUEST FOR PRODUCTION, ITEM NO. 42

<u>Location</u>		<u>Reason</u>
<u>Heading</u>		<u>Reason</u>
All pages		2
<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
% of Total UNE-Ps	all pages (all nos.)	2
% IDLC	all pages (all nos.)	2
UNE-P Growth per Month	all pages (all nos.)	2
UNE-L Growth per Month	all pages (all nos.)	2
Total UNE-P Dec. 2004	all pages (all nos.)	2
Monthly UNE-P to UNE-L Conversion Plus Normal UNE-P and UNE-L Growth	all pages (all nos.)	2
Daily UNE-P to UNE-L Conversions	all pages (all nos.)	2
Daily Conversions Requiring Outside Dispatch	all pages (all nos.)	2
Daily Conversions to SL1 Non-Coordinated	all pages (all nos.)	2
Daily Conversions to SL1 Coordinated	all pages (all nos.)	2

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

REQUEST FOR PRODUCTION, ITEM NO. 42 (CONT.)

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Daily Conversions to SL2 (Coordinated)	all pages (all nos.)	2
CO Transfer Man-Hours	all pages (all nos.)	2
Outside Transfer Man-Hours	all pages (all nos.)	2

<u>Rows Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Regional Total	bates stamp page BST000518	2
Florida Total	bates stamp page BST000522	2
Headcount	bates stamp page BST000518	2
Add Undistributed	bates stamp page BST000518	2
Supervisors 15/1	bates stamp page BST000518	2
Total Force	bates stamp page BST000518	2
Headcount	bates stamp page BST000522	2
Add Undistributed	bates stamp page BST000522	2
Supervisors 15/1	bates stamp page BST000522	2
Total Force	bates stamp page BST000522	2

REQUEST FOR PRODUCTION, ITEM NO. 44

Entire Document	1
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ATTACHMENT A

**BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

REQUEST FOR PRODUCTION, ITEM NO. 48

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Jan-03	all pages (all nos.)	1
Feb-03	all pages (all nos.)	1
Mar-03	all pages (all nos.)	1
Apr-03	all pages (all nos.)	1
May-03	all pages (all nos.)	1
Jun-03	all pages (all nos.)	1
Jul-03	all pages (all nos.)	1
Aug-03	all pages (all nos.)	1

REQUEST FOR PRODUCTION, ITEM NO. 49

<u>Location</u>	<u>Reason</u>
Entire Document	3

REQUEST FOR PRODUCTION, ITEM NO. 53

<u>Location</u>	<u>Reason</u>
Entire Document	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

REQUEST FOR PRODUCTION, ITEM NO. 54

Location

<u>Column Labeled</u>	<u>Reason</u>
Jan-02 (all nos.)	1
Feb-02 (all nos.)	1
Mar-02 (all nos.)	1
Apr-02 (all nos.)	1
May-02 (all nos.)	1
Jun-02 (all nos.)	1
Jul-02 (all nos.)	1
Aug-02 (all nos.)	1
Sep-02 (all nos.)	1
Oct-02 (all nos.)	1
Nov-02 (all nos.)	1
Dec-02 (all nos.)	1
Jan-03 (all nos.)	1
Feb-03 (all nos.)	1
Mar-03 (all nos.)	1
Apr-03 (all nos.)	1
May-03 (all nos.)	1
Jun-03 (all nos.)	1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
Page 1 of 1
01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 3rd REQUESTS FOR PRODUCTION, ITEM NOS.
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,
IN FLORIDA DOCKET NO. 030851-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE