

ORIGINAL

Legal Department

NANCY B. WHITE
Attorney
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

January 27, 2004

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
CLERK

JAN 27 PM 4:59

040467-TL
undocketed

**RE: Florida Public Service Commission Audit Document/
Record Request Florida Sales Review**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for comments of the report or the audit workpapers, which we ask that you file in the captioned audit.

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 (KAB)

Enclosures

cc: All Parties of Record
Marshall M. Criser III
R. Douglas Lackey
Beth Keating
Lisa Harvey

This request for confidentiality was filed by or on behalf of a telecommunications company for undocketed Confidential Document No. 01220-04. No ruling is required unless the material is subject to a request per 119.07, FS. Your division director must obtain written permission from the EXD/Tech for you to access the confidential material.

Confidential
DOCUMENT NUMBER-DATE

01220 JAN 27 04

FPSC-COMMISSION CLERK

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH *conf records*

Request *Redacted*
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE
01218 JAN 27 04 01219 JAN 27 04

FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Florida Public Service Commission Audit)	Undocketed
Document /Record Request Florida Sales)	
Review)	
<hr/>		Filed: January 27, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

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

1. In a letter dated January 6, 2004, the Florida Public Service Commission (the "Commission") requested that BellSouth provide any company comments and any request for confidential classification of the report or the audit workpapers in accordance with Chapter 25-22.006(5) Florida Administrative Code by January 27, 2004. BellSouth provided certain information to Staff in response to audit document requests. Pursuant to FPSC rule 25-22.006(2), BellSouth indicated on the document request Form PSC/AFA6 that certain information contained confidential business information.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Specified Confidential Classification for its responses to various audit requests, staff workpapers and portions of the Follow up Report regarding BellSouth's Sales Methods and Practices because said documents and responses contain, among other things, competitive business information and customer specific information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

3. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

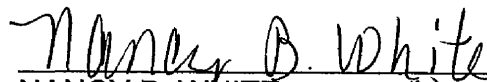
4. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

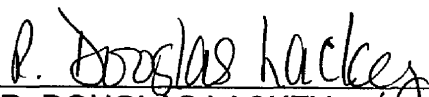
WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 27th day of January, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (BA)
JAMES MEZA III
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558



R. DOUGLAS LACKEY (BA)
675 W. Peachtree Street
Suite 4300
Atlanta, Georgia 30375
(404) 335-0747

523771

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Florida Public Service Commission/
Audit Document/Record Request
Florida Sales Review
Page 1 of 3**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO FLORIDA PUBLIC SERVICE COMMISSIONS
AUDIT DOCUMENT/RECORD REQUEST FLORIDA
SALES REVIEW**

Explanation of Proprietary Information

1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Specifically this information reflects information associated with vendor contracts and vendor specific pricing negotiated by BellSouth. Disclosure of this data would impair the competitive business interests of BellSouth and would impair BellSouth's ability to contract for goods and/or services on favorable terms. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d), Florida Statutes and is exempt from the Open Records Act.
2. This information is proprietary to BellSouth and includes information containing customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. Consequently, this information is confidential and proprietary pursuant to Section 364.183(f) and Section 364.24, Florida Statutes.
3. This information relates to confidential personnel information concerning BellSouth employees. This information is a name and/or control number used to identify an employee in lieu of a social security number. Since this information is employee personnel information unrelated to compensation, duties, qualifications or responsibilities it should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(f), Florida Statutes, and is exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Florida Public Service Commission/
Audit Document/Record Request
Florida Sales Review
Page 2 of 3**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO FLORIDA PUBLIC SERVICE COMMISSIONS
AUDIT DOCUMENT/RECORD REQUEST FLORIDA
SALES REVIEW**

Explanation of Proprietary Information

4. The subject information includes methods, practices and procedures developed and used by BellSouth in training its sales personnel. This material is proprietary and confidential business information used by BellSouth in conducting its business and not commonly known by or available to the public. Furthermore, this information has been prepared at great cost to BellSouth, and therefore, others should not be permitted to gain the benefit from not having to develop these instructions and materials themselves. Those practices and procedures are not publicly disclosed, and were developed by BellSouth only by expending a great deal of time and money. Accordingly, this information constitutes confidential business information pursuant to Section 364.183(3)(e), and is exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Florida Public Service Commission/
Audit Document/Record Request
Florida Sales Review
Page 3 of 3**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO FLORIDA PUBLIC SERVICE COMMISSIONS
AUDIT DOCUMENT/RECORD REQUEST FLORIDA
SALES REVIEW**

Explanation of Proprietary Information

AUDIT WORKPAPERS

<u>Location</u>	<u>Reason</u>
BST000002-61	1
BST000062-559	4
BST000560-580	3&4
BST000581-584	4
BST000585-832	3&4
BST000833-1159	4
BST001180-1202	3&4
BST001203-1205	4
BST001213-1516	4
BST001517-1518	2
BST001519-1538	4
BST001539-1618	2

AUDIT REPORT

Page 25	Lines 1-5, 27	1
Page 26	Lines 9, 11, 15-16	1
Page 27	Lines 12-15	4
Page 29	Lines 1-17, 31-35	4
Page 30	Lines 3-36	4
Page 31	Lines 3-13, 22-24	4
Page 32	Lines 2-14, 22-31	4
Page 39	Line 19	1
Page 40	Lines 33, 35	1
Page 41	Lines 1, 3, 13, 16-19, 21	1
Page 46	Lines 19, 20, 22, 25-30	1