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February 18, 2004

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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 Surrebuttal Testimony of Alphonso J. Varner, W. Keith Milner and exhibit WKM-5, Kenneth L. Ainsworth, Pamela A. Tipton and Dr. Debra J. Aron, 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

Enclosure

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

527778

This confidentiality request was filed by or for a "telco" for DN 0236904. 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.

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SEC  
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*Request*      *Redacted*      *Confidential*  
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FPSC-COMMISSION CLERK    FPSC-COMMISSION CLERK    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 18<sup>th</sup> day of February 2004 to the following:

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*Nancy B White*

\_\_\_\_\_  
Nancy B. White (LH)

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

**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: February 18, 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 January 28, 2004, BellSouth filed in the above-captioned proceeding, Surrebuttal Testimony of Alphonso J. Varner, W. Keith Milner and exhibit WKM-5, Kenneth L. Ainsworth, Pamela A. Tipton and Dr. Debra J. Aron. The Surrebuttal Testimony of Alphonso J. Varner, W. Keith Milner with Exhibit WKM-5, Kenneth L. Ainsworth, Pamela A. Tipton, and Dr. Debroa J. Aron include customer proprietary and confidential business information that is considered proprietary to BellSouth. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the above referenced attachment contains confidential business information that is proprietary to BellSouth. 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 in future negotiations. The information discussed in Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary 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 documents 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.

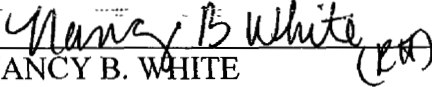
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

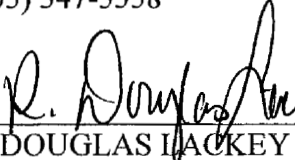
7. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the Parties.

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 18<sup>th</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER, W. KEITH MILNER AND  
EXHIBIT WKM-5, KENNETH L. AINSWORTH, PAMELA A. TIPTON AND DR.  
DEBRA J. ARON FILED JANUARY 28, 2004, 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. 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 is proprietary to BellSouth and includes information containing customer proprietary and business proprietary information. The Commission has always zealously protected customer proprietary and business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

<u>Location</u>	<u>Reason</u>
<b>Surrebuttal of Alphonso J. Varner</b>	
Page 45, lines 23-24	2
<b>Surrebuttal of W. Keith Milner</b>	
Page 7, line 21	2
Page 8, lines 1, 3, 12, 19-20	2
Page 9, lines 16, 23	2

BellSouth Telecommunications, Inc.  
 FPSC Docket No. 030851-TP  
 Request for Confidential Classification  
 Page 1 of 2  
 2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
 SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER, W. KEITH MILNER AND  
 EXHIBIT WKM-5, KENNETH L. AINSWORTH, PAMELA A. TIPTON AND DR.  
 DEBRA J. ARON FILED JANUARY 28, 2004, IN FLORIDA DOCKET NO. 030851-TP**

<u>Location</u>	<u>Reason</u>
<b>Surrebuttal of W. Keith Milner</b>	
Page 10, lines 3-5	2
Page 10, lines 8, 10, 23-Page 11, line 1	2
<b>WKM-5</b>	
Entire document	2
<b>Surrebuttal of Kenneth I. Ainsworth</b>	
Page 12, line 23	2
Page 13, lines 5-8, 10-13	2
Page 31, line 20	2
Page 33, line 3-6, 12-14, 17, 21-25	2
<b>Surrebuttal of Pamela A. Tipton</b>	
Page 8, line 5	2
Page 14, lines 19-20	2
Page 17, line 17	2
<b>Surrebuttal of Dr. Debra J. Aron</b>	
Page 58, line 4	1
Page 75, lines 20, 22-23	1
Page 87, lines 16, 18	1