

Nancy B. White
General Counsel-Florida

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

February 23, 2004

RECEIVED-PPSC
FEB 23 PM 1:46
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 Florida Public Commission Staff's Seventh Set of Interrogatories Item No. 180-1 and Request for Production of Documents, Nos. 100, 104, 109, 112, 113, 114 and 115 provided on CD-ROM, 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
RA

Enclosure

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

528337

This confidentiality request was filed by or for a "telco" for DN0260604. 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. 0226504)

DOCUMENT NUMBER-DATE

02605 FEB 23 04

FPSC-COMMISSION CLERK

RECEIVED & FILED

R.V.N.

FPSC-BUREAU OF RECORDS

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL
- OPC _____
- MMS _____
- SEC
- OTH _____

1.com records

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 23rd day of February 2004 to the following:

Jeremy Susac, Staff Counsel *
Pat Lee
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6236
Fax: (850) 413-6250
jsusac@psc.state.fl.us
plee@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 ~
jmcglothlin@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
jbelle@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~
fself@lawfla.com
nhorton@lawfla.com

De O'Roark, Esq. (+)
MCI WorldCom Communications, Inc.
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328
de.oroark@mci.com

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
aisar@millerisar.com

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
lisariley@att.com

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

Allegiance E-mail Only
charles.gerkin@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

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

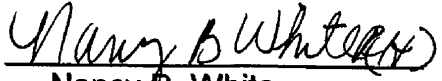
AT&T by E-Mail only: (+)
soniadaniels@att.com

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
2301 Lucien Way
Suite 200
Maitland, FL 32751
Tel. No. 407 835-0460
Fax No. 407 835-0309
mfeil@mail.fdn.com
skassman@mail.fdn.com

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

Charlie Beck (+)
Deputy Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax No. (850) 488-4491
Beck.Charles@leg.state.fl.us


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) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: February 23, 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 February 17, 2004, BellSouth filed its Responses to Staff's Seventh Set of Interrogatories and Requests for Production of Documents dated February 2, 2004. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to Staff's Seventh Set of Interrogatories Item No. 180-1 and Requests for Production Item Nos. 100, 104, 109, 112, 113, 114 and 115 provided on CD-ROM.

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 Responses to Staff's Seventh Set of Interrogatories and Seventh Requests for Production include 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 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 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 23rd day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

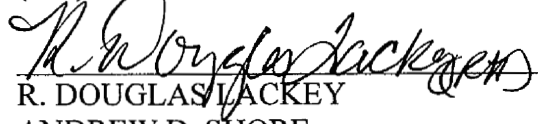
JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY

ANDREW D. SHORE

MEREDITH MAYS

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0750

528177

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSES TO STAFF'S SEVENTH SET OF INTERROGATORIES ATTACHMENT
TO ITEM NO. 180-1 AND REQUESTS FOR PRODUCTION ATTACHMENTS TO
ITEM NOS. 100, 104, 109, 112, 113, 114, AND 115 PROVIDED ON CD-ROM
FILED FEBRUARY 17, 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. Specifically, this information provides the number of lines by wirecenter or UNEZone. 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.
2. This reflects competitive information which BellSouth uses in conducting business. Specifically, it contains BellSouth's cost information, which, if disclosed would provide competitors with a marketing advantage. In addition, BellSouth cannot obtain its competitor's cost to provide service, therefore, it would be inequitable and unfair for BellSouth's competitors to have such cost data. This is valuable information that BellSouth strives to keep secret. Therefore, 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.
3. This information reflects vendor-specific pricing negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
4. 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.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSES TO STAFF'S SEVENTH SET OF INTERROGATORIES, ATTACHMENT
TO ITEM NO. 180-1 AND REQUESTS FOR PRODUCTION, ATTACHMENTS TO
ITEM NOS. 100, 104, 109, 112, 113, 114, AND 115 PROVIDED ON CD-ROM
FILED FEBRUARY 17, 2004, IN FLORIDA DOCKET NO. 030851-TP**

<u>Location</u>	<u>Reason</u>
<u>Interrogatories, Attachment to Item No. 180-1</u>	
All numbers in columns (d) and (e)	1
<u>Requests for Production, Attachment to Item No. 100</u>	
Entire File on CD ROM labeled 100	2
<u>Requests for Production, Attachment to Item No. 104</u>	
Entire File on CD ROM labeled 104	2
<u>Requests for Production, Attachment to Item No. 109</u>	
Entire File on CD ROM labeled 109	3
<u>Requests for Production, Attachment to Item No. 112</u>	
Entire File on CD ROM labeled 112	3
<u>Requests for Production, Attachment to Item No. 113</u>	
All Files on CD ROM labeled 113	2
<u>Requests for Production, Attachment to Item No. 114</u>	
All Files on CD ROM labeled 114	2
<u>Requests for Production, Attachment to Item No. 115</u>	
All Files on CD ROM labeled 115	2