

ORIGINAL

Legal Department

Nancy B. White
General Counsel-Florida

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

March 2, 2004

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MARCH -2 PM 4:41
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. 030852-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Supplemental Responses to Florida Public Commission Staff's Third Set of Interrogatories, Item Nos. 39, 40, 46 and 47; and Fourth Set of Interrogatories Nos. 62, 63, 64, 65, 66, 69, 72 and 73, 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 Bushite
Nancy B. White (PH)

Enclosure

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

DN 03103-04 REQ
03104-04 REDACTED
03105-04 CONFIDENTIAL
Nos. 39, 40, 46, 47

431

DNs 03106-04 REQ
03107-04 REDACTED
03108-04 CONFIDENTIAL
Nos. 62-66, 69, 72-73

RECEIVED & FILED

WVN
EPSC-BUREAU OF RECORDS

CERTIFICATE OF SERVICE
Docket No. 030852-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and FedEx® this 2nd day of March 2004 to the following:

Adam Teitzman, Staff Counsel*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Phone: (850) 413-6212
Fax: (850) 413-6250
ateitzma@psc.state.fl.us

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Ste. 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.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

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
jmcglothlin@mac-law.com
vkaufman@mac-law.com
Represents FCCA

Mr. Charles E. Watkins+
1230 Peachtree Street, NE
19th Floor
Atlanta, GA 30309-3574
Phone: (404) 942-3492
Fax: (404) 942-3495
Represents Covad
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
Represent ITC^DeltaCom
nedwards@itcdeltacom.com

Ms. Donna C. McNulty+⊗
MCI WorldCom Communications, Inc.
1203 Governors Square Blvd.,
Suite 201
Tallahassee, FL 32301-2960
Phone No. 850- 219-1008
Fax No. 850 219-1018
Represents MCI WorldCom
donna.mcnulty@mci.com

De O'Roark, Esq. (+)
MCI WorldCom Communications, Inc (GA)
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328
Represents MCI WorldCom
de.oroark@mci.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 MCI
Represents KMC
Represents Xspedius~
fself@lawfla.com
nhorton@lawfla.com

Tracy Hatch, Esq. **
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6364
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

Marva Brown Johnson, Esq.
KMC Telecom III, LLC
1755 North Brown Road
Lawrenceville, GA 30043-8119
Tel. No. (678) 985-6261
Fax No.: (678) 985-6213
Represents KMC
marva.johnson@kmctelecom.com

Richard A. Chapkis (+)
Kimberly Caswell
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
Represents Verizon
Richard.chapkis@verizon.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

Jean Houck
Business Telecom, Inc.
4300 Six Forks Road
Raleigh, NC 27609
Tel. No. (919) 863-7325
jean.houck@btitelecom.net

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

Jon Moyle, Jr.
Moyle Law Firm (Tall)
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
Phone: (850) 681-3828
Fax: 681-8788
Represents NuVox Communications Inc.
Email: jmoylejr@moylslaw.com

Allegiance E-mail Only
charles.gerkin@alqx.com

Terry Larkin
Allegiance Telecom, Inc.
700 East Butterfield Road
Lombard, IL 60148
Phone: (630) 522-6453
terry.larkin@alqx.com

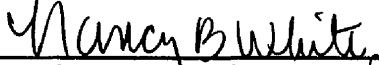
Jorge Cruz-Bustillo +
Assistant General Counsel
Supra Telecommunications
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel. No. (305) 476-4252
Fax. No. (305) 443-1078
jorge.cruz-busitillo@stis.com

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
Email: jonathan.audu@stis.com

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

Bo Russell
Nuvox Communications Inc.
301 North Main Street
Greenville, SC 29601-2171
Phone: (864) 331-7323
Email: brussell@nuvox.com

J. Jeffry Wahlen
Ausley & McMullen
227 South Calhoun Street
Tallahassee, FL 32301
Tel. No. (850) 425-5471
Fax. No. (850) 222-7560
jwahlen@ausley.com


Nancy B. White *(RD)*

(+) 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. 030852-TP
Triennial UNE review: Location Specific-Review)
For DS1, DS3, and Dark Fiber Loops and) Filed: March 2, 2004
Route-Specific Review for DS1, DS3, and Dark)
Fiber Transport)
_____)

**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 24, 2004, BellSouth filed its response to Staff's Fourth Set of Interrogatories (Nos. 48-81) and Fourth Request for Production of Documents (Nos. 38-39). On this same day, BellSouth filed a Notice of Intent pertaining to the attachments to responses to Interrogatory Nos. 62, 63, 64, 65, 66, 69, 72 and 73 which contain confidential information that is proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the attachments to BellSouth's responses to Interrogatory Nos. 62, 63, 64, 65, 66, 69, 72 and 73 contain confidential information that is proprietary to BellSouth, in particular, customer specific information. A more specific description of this information is contained in Attachment A.

3. 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

DOCUMENT NUMBER-DATE
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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.

4. 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.

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

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

7. 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.

8. 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 2nd day of March, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White

NANCY B. WHITE

(KED)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY

MEREDITH E. MAYS (KHA)

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0750

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 030852-TP
Request for Confidential Classification
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3/2/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 62, 63, 64, 65, 66, 69, 72
and 73) FILED FEBRUARY 24, 2004, IN
FLORIDA DOCKET NO. 030852-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 contains customer specific information. 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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030852-TP
Request for Confidential Classification
Page 2 of 2
3/2/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 62, 63, 64, 65, 66, 69, 72
and 73) FILED FEBRUARY 24, 2004, IN
FLORIDA DOCKET NO. 030852-TP**

Interrogatory No. 62, Attachment

Entire Attachment 1 and 2

Interrogatory No. 63, Attachment

Entire Attachment 1 and 2

Interrogatory No. 64, Attachment

Entire Attachment 1 and 2

Interrogatory No. 65, Attachment

Entire Attachment 1 and 2

Interrogatory No. 66, Attachment

Entire Attachment 1 and 2

Interrogatory No. 69, Attachment

Entire Attachment 1 and 2

Interrogatory No. 72, Attachment

Entire Attachment 1 and 2

Interrogatory No. 73, Attachment

Entire Attachment 1 and 2