

ORIGINAL

Legal Department

JAMES MEZA III  
Attorney  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0769

May 28, 2004

RECEIVED - FPSC  
MAY 28 PM 1:22  
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: 031125-TP: Complaint of IDS Telecom LLC against BellSouth Telecommunications, Inc., for over billing and discontinuance of service, and petition for emergency order restoring service**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request Specified Confidential Classification of Exhibits F, G, H, and I to BellSouth's Counterclaim, which we ask that you file in the captioned 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.

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SEC 1  
OTH conf records

Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

Sincerely,

James Meza III

This confidentiality request was filed by or for a "telco" for DN 05402-04. 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.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
06119 MAY 28 04  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 031125-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Facsimile this 28th day of May, 2004 to the following:

Patty Christensen  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6191  
Fax. No. (850) 413-6221  
[pchrste@psc.state.fl.us](mailto:pchrste@psc.state.fl.us)

Norman H. Horton, Jr.  
Meser, Caparello & Self, P.A.  
215 South Monroe Street, Suite 701  
P.O. Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax No. (850) 224-4359  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)  
Represents IDS

  
James Meza III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint against BellSouth Telecommunications,) Docket No.: 031125-TP  
Inc. for alleged overbilling and discontinuance of service,) )  
by IDS Telecom, LLC )  
\_\_\_\_\_ ) Filed: May 28, 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 this Request for Specified Confidential Classification.

1. On May 7, 2004, BellSouth filed its Counterclaim against IDS Telecom, LLC (hereinafter "IDS") portions of which contains information that IDS presumably considers to be confidential. A more specific description of this information is provided in Attachment A. These documents 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.

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 private financial 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.

DOCUMENT NUMBER-DATE

06119 MAY 28 3

FPSC-COMMISSION CLERK

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 28<sup>th</sup> day of May, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White *smh*

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

James Meza III *smh*

R DOUGLAS LACKEY

JAMES MEZA III

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

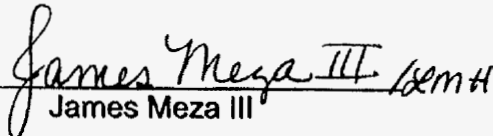
(404) 335-0769

**CERTIFICATE OF SERVICE  
DOCKET NO. 031125-TP**

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Patty Christensen  
Staff Counsel  
Florida Public Service  
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Division of Legal Services  
2540 Shumard Oak Boulevard  
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Tel. No. (850) 413-6191  
Fax. No. (850) 413-6221  
[pchrister@psc.state.fl.us](mailto:pchrister@psc.state.fl.us)

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Tel. No. (850) 222-0720  
Fax No. (850) 224-4359  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)  
Represents IDS

  
James Meza III

BellSouth Telecommunications, Inc.  
FPSC Docket No. 031125-TP  
Request for Confidential Classification  
Page 1 of 1  
5/28/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS F, G, H AND I TO  
ITS COUNTERCLAIM AGAINST IDS TELECOM, LLC FILED MAY 7, 2004,  
IN FLORIDA DOCKET NO. 031125-TP**

**Explanation of Proprietary Information**

1. This information relates to IDS's financial well-being. IDS presumably considers this information to be confidential, proprietary business information. 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.

| <u>Location</u>                            | <u>Reason</u> |
|--|---------------|
| <b><u>Exhibit F</u></b><br>Entire Document | 1             |
| <b><u>Exhibit G</u></b><br>Entire Document | 1             |
| <b><u>Exhibit H</u></b><br>Entire Document | 1             |
| <b><u>Exhibit I</u></b><br>Entire Document | 1             |