

Meredith Mays  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
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Tallahassee, Florida 32301  
(404) 335-0750

June 17, 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

**Re: Docket No. 030829-TP (FDN Complaint)**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for the Supplemental Direct Testimony of Cynthia A. Clark, Exhibit CAC-1 on CD, which we ask that you file 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,

  
Meredith Mays

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

541675

DOCUMENT NUMBER-DATE

06745 JUN 17 2004

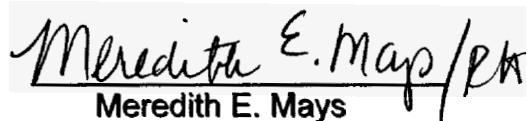
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030829-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and/or FedEx this 17<sup>th</sup> day of June, 2004 to the following:

Lee Fordham\*  
Staff Counsel  
Florida Public Service Commission  
Gerald L. Gunter Building  
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Tel. No.: 850 413-6199  
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Scott Kassman(+)  
FDN Communications  
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Meredith E. Mays

**(+) signed Protective Agreement  
(\* ) Hand Delivery**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re:	)	
	)	
Complaint of FDN Communications for	)	Docket No. 030829-TP
Resolution of Certain Billing Disputes	)	
And Enforcement of UNE Orders and	)	Filed: June 17, 2004
Interconnection Agreements with	)	
BellSouth Telecommunications, Inc.	)	
_____	)	

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

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification.

1. On June 1, 2004, BellSouth Telecommunications, Inc. filed the Supplemental Direct Testimony of Cynthia A. Clark in Florida Public Service Commission Docket 030829-TP. Attached to Ms. Clark's Supplemental Direct Testimony was Exhibit CAC-1, a CD containing disputes detail workpapers.

2. Pursuant to Rule 25-22.06 (3) (a), BellSouth is now filing a Request for Confidential Classification with respect to Exhibit CAC-1, a CD of disputes detail workpapers that includes confidential business information that is considered proprietary to BellSouth. In addition, on June 1, 2004 BellSouth filed a Notice of Intent to Request Specified Confidential Classification.

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 in that disclosure would cause harm to BellSouth's business operation and would impair BellSouth's ability to compete.

4. BellSouth has appended to this Request for Confidential Classification a listing showing the location in the response of the information designated by BellSouth as confidential as Attachment A.

5. Appended hereto in an envelope designated as Attachment B are two copies of the information with the confidential information redacted.


6. Attached as Attachment C is a sealed envelope containing one copy of the information with the material which is confidential and proprietary.

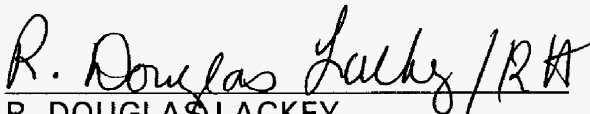
7. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

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

Respectfully submitted this 17th day of June 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
NANCY B. WHITE  
c/o Nancy H. Sims  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

  
R. DOUGLAS LACKEY  
MEREDITH E. MAYS  
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675 West Peachtree Street, N.E.  
Atlanta, GA 30375  
(404) 335-0750

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC DOCKET 030829-TP  
Request for Confidential Classification  
Page 1 of 1  
6/17/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CYNTHIA A. CLARK'S  
EXHIBIT CAC-1, A CD OF DISPUTES DETAIL WORKPAPERS FILED WITH THE  
SUPPLEMENTAL DIRECT TESTIMONY ON JUNE 1, 2004, IN FPSC DOCKET  
030829-TP**

**Explanation of Proprietary Information**

1. This information contains competitive business information. The subject information includes internal methods and procedures, and job aids. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to maintain the confidentiality of this information. Therefore, such information is a trade secret which 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.

**LOCATION**

**REASON**

**COMPACT DISK**

PROPRIETARY DISPUTE DETAIL WORKSHEETS - CD

**FILE NAME**

FDNNVEPSCDISP.xls	1
FDW Analysis.xls	1
FWDNandQLPCCalculations2.xls	1
Testimony Summary fdn.xls	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC DOCKET 030829-TP  
Request for Confidential Classification  
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6/17/04**

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030829-TP**

**TWO REDACTED COPIES**

**ENTIRE CD**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC DOCKET 030829-TP  
Request for Confidential Classification  
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6/17/04**

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030829-TP**

**ONE HIGHLIGHTED COPY**