

JAMES MEZA III  
Senior Regulatory Counsel

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

January 6, 2005

Mrs. Blanca S. Bayó  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

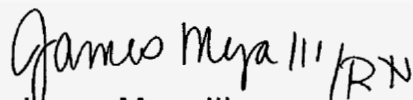
**Re: 041114-TP – Complaint of XO Florida, Inc. Against  
BellSouth Telecommunications, Inc. for Refusal to Convert  
Circuits to UNEs and for Expedited Processing**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification, 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.

Sincerely,

  
James Meza III

Enclosures

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

DOCUMENT NUMBER-DATE  
00202 JAN-6 '05  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 041114-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 6th day of January, 2005 to the following:

Jason Rojas  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6179  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)

Vicki Gordon Kaufman (+)  
McWhirter Reeves McGlothlin  
Davidson Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents XO

Dana Shaffer  
XO Florida, Inc.  
VP, Regulatory Counsel  
105 Molloy Street, Ste. 300  
Nashville, TN 37201  
Tel. No. (615) 777-7700  
Fax. No. (615) 850-0343  
[dana.shaffer@xo.com](mailto:dana.shaffer@xo.com)

  
James Meza III

**(+) SIGNED PROTECTIVE AGREEMENT**

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint of XO Florida, Inc.	)	
Against BellSouth Telecommunications,	)	Docket No. 041114-TP
Inc. for Refusal to Convert Circuits to	)	
UNEs and for Expedited Processing	)	Filed: January 6, 2005

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**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED 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 December 15, 2004, BellSouth served its proprietary responses to XO's First Set of Interrogatories (Nos. 1-8) and First Request for Production of Documents (Nos. 1-7).
2. In order for Staff to take possession of BellSouth's responses to XO, on December 16, 2004 BellSouth filed a Notice of Intent, in particular, for BellSouth's Response to Interrogatory No. 5 and the documents provided in BellSouth's Response to XO's First Request for Production, Item Nos. 1 and 7, which contains confidential business, proprietary information. A more specific description of this information is provided in Attachment A. These items 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.
3. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.

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

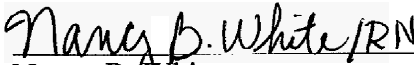
5. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.


6. 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 6<sup>th</sup> day of January 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
Nancy B. White  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. Douglas Lackey  
James Meza III  
BellSouth Center – Suite 4300  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375  
(404) 335-0769

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 041114-TP**  
**Request for Confidential Classification**  
**Page 1 of 2**  
**1/6/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST  
FOR PRODUCTION, NOS. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA  
DOCKET NO. 041114-TP**

**Explanation of Proprietary Information**

1. This information contains competitive, business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. 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.
2. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available 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.
3. 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.

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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DOCKET NO. 041114-TP**

<u>Location</u>	<u>Reason</u>
<b><u>INTERROGATORY NO. 5</u></b>	
Lines 4 and 5 of Response	1 and 2
<b><u>POD NO. 1</u></b>	
Attachment GG (Bates STFF1STPOD000511- STFF1STPOD000512)	2
Attachment II (Bates STFF1STPOD000552- STFF1STPOD000579)	3
<b><u>POD NO. 7</u></b>	
Entire Document	2

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 041114-TP**  
**Request for Confidential Classification**  
Page 1 of 1  
1/6/05

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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FOR PRODUCTION, NOS. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA  
DOCKET NO. 041114-TP**

**2 COPIES OF PUBLIC DISCLOSURE DOCUMENT**

**REQUEST:** Provide and explain in detail Bell's proposed price for a 'switch as is,' or conversion without disconnection and reconnection of the circuit, for conversion of special access zero mileage loops to UNE loops, including an explanation of each charge and the basis for each charge.

**RESPONSE:** BellSouth's proposed cost-based price for those CLECs that have amended their agreement to be TRO compliant for the conversion of special access circuits to UNE loops in Florida is as follows:

DS0 loops =  
DS1 loops =



**RESPONSE PROVIDED BY:**

Jerry Latham  
Sr. Product Manager – UNE Loops



BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 1

**POD NO. 1  
DOCUMENT "GG"**

**PROPRIETARY**

XO1stPODNO1 000511 --  
000512

Entire Attachment

XO1stPODNO1000511

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 1

POD NO. 1  
DOCUMENT "II"

**PROPRIETARY**

XO1st POD No 1

000552-

000579

Entire  
Attachment

XO1stPODNO1000552

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO Florida's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 7  
ATTACHMENT

**PROPRIETARY**

Entire  
Attachment

**REQUEST:** Provide and explain in detail Bell's proposed price for a 'switch as is,' or conversion without disconnection and reconnection of the circuit, for conversion of special access zero mileage loops to UNE loops, including an explanation of each charge and the basis for each charge.

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 1

**POD NO. 1  
DOCUMENT "GG"**

**PROPRIETARY**

XO 1st POD No 1 000511 -

000512

Entire Attachment

XO1stPODNO1000511

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 1

**POD NO. 1  
DOCUMENT "II"**

**PROPRIETARY**

XO1stPODNO1 000552-  
000579

Entire  
Attachment

XO1stPODNO1000552

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO Florida's 1<sup>st</sup> Request for Production  
November 22, 2004  
Item No. 7  
ATTACHMENT

**PROPRIETARY**

Entire

Attachment

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 1 of 1  
1/6/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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FOR PRODUCTION, NOS. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA  
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**PROPRIETARY COPY**