

Robert A. Culpepper
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May 10, 2005

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

Re: **Docket No. 000121A-TP**

**In Re: Investigation into the establishment of operations support
systems permanent incumbent local exchange Telecommunications
companies**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified 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. A copy of the same is being provided to all parties of record.

Sincerely,


Robert A. Culpepper

Enclosures

cc: All parties of record
Marshall M. Criser, III
Nancy B. White
R. Douglas Lackey

DOCUMENT NUMBER-DATE
04549 MAY 10 05
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and U.S. Mail this 10th day of May, 2005 to the following:

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Robert A. Culpepper

**(+) Signed Protective
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the)
Establishment of Operations Support)
Systems Permanent Performance)
Measures for Incumbent Local Exchange)
Telecommunications Companies) Docket No. 000121A-TP
Filed: May 10, 2005

**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 April 19, 2005, BellSouth Telecommunications, Inc. filed the Final Report of the Audit of BellSouth's Performance Assessment Plan for Florida conducted by the Liberty Consulting Group. This report contains information that is proprietary to BellSouth.

2. In order for Staff to take possession of the Final Report, BellSouth is filing this Request for Specified Confidential Classification. The Final Report 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. BellSouth is filing this Request for Confidential Classification to describe exactly what portions are proprietary.

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 proprietary highlighted copy of the confidential information.

14549 MAY 10 2005
FPSC-COMMISSION CLERK

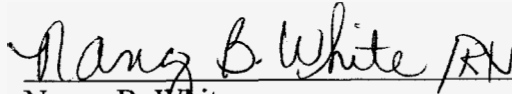
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.

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 10th day of May, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, followed by a horizontal line.

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

Handwritten signature of Robert Culpepper in cursive, followed by a horizontal line.

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 000121A-TP
Request for Confidential Classification
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5/10/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FINAL
REPORT OF THE AUDIT OF BELLSOUTH'S PERFORMANCE ASSESSMENT PLAN
FOR FLORIDA AS FILED APRIL 19, 2005,
IN FLORIDA DOCKET NO. 000121A-TP**

Explanation of Proprietary Information

1. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, this document contains information related to the findings of The Liberty Consulting Group in their review of BellSouth's performance measurement plan. The network operations/systems that are necessary to implement this plan and the functions each perform, as well as specific coding of order is considered proprietary and confidential to BellSouth as it describes BellSouth's internal operations. Furthermore, this information has been prepared at great cost to BellSouth. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

FINAL REPORT – Information highlighted in the following lines:

<u>Location</u>	<u>Reason</u>
Page 5, lines 12, 23-25, 27, 31-35, 37-41	1
Page 6, lines 1-11, 18, 24, fn 11	1
Page 7, lines 1, 13-25, 33	1
Page 30, lines 33-34, fn 59	1
Page 31, lines 2 and 5	1
Page 39, lines 15 and 20	1
Page 65, lines 4, 7, 8 and 10	1
Page 66, lines 25-26, 35 and fn 176	1

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<u>Location</u>	<u>Reason</u>
Page 67, lines 1-3, 9-11, 14, 15, 17, 21, 22 26, 35, 36, 37, 39 and 41	1
Page 68, lines 2, 8, 9, 11-13, 15-16, 19-20, 22-24, 26 and 31	1
Page 69, line 13	1
Page 70, lines 4, 6-11, 14, 18 and 20	1
Page 71, lines 1, 6-7, 21, 35-36, 39, 42-43	1
Page 72, line 2	1
Page 75, lines 16-18, 21-22, 24-25 and 35	1
Page 76, lines 21, 32-33, fn 203	1
Page 77, lines 34 and fn 206	
Page 78, lines 10-11, 22-27, 30, 31, 33, 40-41, fn 207	1
Page 79, line 4, 14 and 22	1
Page 80, lines 13-17, 24, 29-39, fn 216	1
Page 81, lines 1-4, 7-8, 21-23, 35-36	1
Page 84, lines 12 and 21	1

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<u>Location</u>	<u>Reason</u>
Page 85, lines 2-3	1
Page 87, lines 16 and 18	1
Page 88, lines 13, 33-34, 36	1
Page 89, lines 17, 22, 26, fn 245	1
Page 90, line 34	1
Page 91, line 1	1
Page 92, line 18	1
Page 95, line 33	1
Page 98, lines 26, 33, 37-38 and 40	1
Page 99, lines 10-11, 13-14, 20, 22-24, 26-29, 31-32, 40	1
Page 100, lines 12, 14-15, 18, 24, 28, line 32, Columns Entitled "Error Code" and "Error Code Description"	1
Page 101, lines 1, columns entitled "Error Code" and "Error Code Description", 2, 5, 10, 12, 13-14, 17-21, 26, 30 and fn 279	1

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<u>Location</u>	<u>Reason</u>
Page 102, lines 1, 10, 12, 14, 21, 24-25, 29, 32, fn 285, fn 287	1
Page 103, lines 2, 6	1
Page 104, lines 22, 24, 27-29, 31, 34, 36, 38-39, 41	1
Page 105, lines 1, 3-6, 8, 12-13,17, 19, 22, 26-33 Fn. 305, fn 308	1
Page 106, lines 1-3, 5-6, 9, 16-18, fn 308 (cont.)	1
Page 107, lines 9, 12-14, 17, 20, 22, 29, 31, 35, Fn 318	1
Page 108, lines 1-5, 7, 11-15, 17, 20-23, 25, 27, 31-32, 35-36, fn 320, fn 323	1
Page 109, lines 2, 6-8, 10-24, 28, 30, 32, fn 324, Fn 327	1
Page 110, lines 6-14, fn 329	1
Page 111, lines 5, 7, 8-12, 14, 38	1
Page 112, lines 1, 19, 21, 39-40	1
Page 113, lines 1, 4, 21, 23, 28	1
Page 114, lines 3-5	1

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<u>Location</u>	<u>Reason</u>
Page 118, lines 26-27, 33, 35, 37, fn 351	1
Page 119, lines 1, 3-13, 18-20, 22, 25, 30, 34-35, 37-39	1
Page 120, lines 3, 6, 8, 37 – column entitled “SNAPRADS Table Name”	1
Page 121, line 1, column 1, lines 2-3, 5-9, 12, 16 – column entitled “SNAPRADS Table Name,” 19-21	1
Page 122, lines 4-5, 9, 17-18, 21, 24-25, 27, 30, 34, 37-38 and 40	1
Page 123, lines 7, 9-14, 37	1
Page 124, lines 1, 24-25	1
Page 125, lines 5-6, 29-30	1
Page 132, lines 19-20, 23	1
Page 133, lines 1-2, 7, 21-22, 26, 29, 32, 36, fn 399 Fn 402	1
Page 134, lines 4, 6, 12, 14, 15 – column entitled “Table Name”, lines 23-24, fn 178	1

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<u>Location</u>	<u>Reason</u>
Page 135, lines 2-3, 10-18, 20-24, 27-31, fn 405 Fn 406	1
Page 136, lines 2-4, 7, 10, 12, 14-21, fn 408	1
Page 137, lines 5, 7, 16-17, 21, 23	1
Page 140, lines 31, 33-36, 38	1
Page 142, lines 5, 7, 9-10, 14	1
Page 143, fn 437	1
Page 148, lines 18, 21, 23, 34-35, fn 454	1
Page 149, fn 455	1
Page 150, line 23, 28	1
Page 152, lines 30-32, 41	1
Page 153, lines 1, 9, 12-15, 21, 30-31	1
Page 154, lines 3, 11, 32, 35, 37, 39	1
Page 155, lines 4, 6, 30-31, 33-35	1
Page 156, lines 3-5, 20, 31	1
Page 157, lines 30-32, 38-39	1

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<u>Location</u>	<u>Reason</u>
Page 158, lines 1, 17, fn 487, fn 489	1
Page 159, lines 33, 36-38, 40-41	1
Page 161, lines 6-7, 15, 17-18, 21, 30, fn 496	1
Page 162, line 26	1
Page 163, line 24	1
Page 166, lines 29-31	1
Page 168, lines 13, 15-16, fn 518	1
Page 170, line 39	1
Page 171, lines 1-2	1
Page 177, lines 6 and 9	1
Page 185, lines 6-7, 12, 38	1
Page 186, lines 17-18, 29-30	1
Page 188, lines 3-4, 6, 31 and 35	1
Page 189, lines 17, 22, 34, fn 576, fn 578	1
Page 190, lines 8-10, fn 581	1

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<u>Location</u>	<u>Reason</u>
Page 191, lines 27, 30, 32, 40 and fn 584	1
Page 192, lines 33-34, 38	1
Page 193, line 7	1
Page 196, lines 19, 24-28, 30-31, 33, 36, 41-42	1
Page 197, lines 5-6, 11, 13-14	1
Page 198, lines 10-13, 17-18, 20	1
Page 207, lines 10, 12, 14-15, 17	1
Page 208, lines 20-23, 27-28, 30	1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
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**REQ EST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FINAL
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2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

ATTACHMENT C

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PROPRIETARY COPY