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November 1, 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: Docket No. 041269-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification regarding its proprietary Fourth Supplemental Response to Covad's First Request for Production of Documents (No. 1), which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

  
Meredith Mays

cc: All Parties of Record  
Jerry Hendrix  
R. Douglas Lackey  
Nancy B. White

608223

DOCUMENT NUMBER-DATE

10597 NOV-1 05

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 041269-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and FedEx this 1<sup>st</sup> day of November, 2005 to the following:

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
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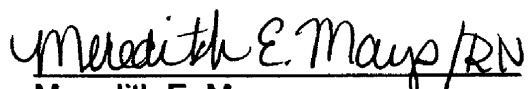
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Meredith E. Mays

(+ )signed Protective Agreement  
(\* ) via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: )  
 ) Docket No. 041269-TP  
Petition to Establish Generic Docket to )  
Consider Amendments to Interconnection )  
Agreements Resulting From Changes of Law ) Filed: November 1, 2005  
 )

**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 it's Request for Specified Confidential Classification.

1. On November 1, 2005, BellSouth filed its Fourth Supplemental Response to DIECA Communications, Inc. d/b/a Covad Communications Company's (hereinafter "Covad") First Request for Production of Documents, Item No. 1, which contains information that the CLECs may consider to be proprietary.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Fourth Supplemental Response to Covad's First Request for Production of Documents includes information that the CLECs may consider to be confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information may cause harm to BellSouth and the CLECs. Therefore, absent further information by the CLECs, such information should be classified as confidential business 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.

3. 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.

4. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the document 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 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, unless articulated otherwise by the CLECs because it is their information, 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 1<sup>st</sup> day of November, 2005.

Handwritten signature of Nancy B. White in cursive, followed by the initials "RN".

---

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

Handwritten signature of R. Douglas Lackey in cursive, followed by the initials "RN".

---

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041269-TP  
Request for Confidential Classification  
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11/01/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FOURTH  
SUPPLEMENTAL RESPONSE TO COVAD'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS, ITEM NO 1, FILED NOVEMBER 1, 2005 IN  
FLORIDA DOCKET NO. 041269-TP**

**Explanation of Proprietary Information**

1. This information arguably contains confidential business information related to competitive interests of the CLECs. The CLECs may argue that the disclosure of this data would impair the competitive business and cause harm to the CLECs.

**Production of Documents, Item No. 1**

<u>Location</u>	<u>Date Stamped Page Numbers</u>	<u>Reason</u>
NTC Attachment	305	1
CLEC Supplemental Response	309,310,311	1



**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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11/01/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FOURTH  
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**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041269-TP  
Request for Confidential Classification  
Page 1 of 1  
11/01/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FOURTH  
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**ONE HIGHLIGHTED COPY**