
JENNIFER S. KAY
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February 23, 2006

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

undocketed

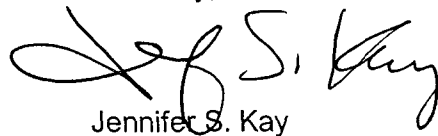
Re: *Review of Pole Inspection and Maintenance Practices of BellSouth, Sprint
and Verizon*

Dear Ms. Bayo:

Enclosed is an original and fifteen copies of BellSouth's Request for Specified Confidential Classification, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Sincerely,


Jennifer S. Kay

Enclosures

cc: Marshall M. Criser III
R. Douglas Lackey
Lisa Harvey

DOCUMENT NUMBER-DATE

01586 FEB 23 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

BellSouth Telecommunications, Inc.'s Pole) Undocketed
Inspection Audit)
_____) Filed: February 23, 2006

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

BellSouth Telecommunications, Inc. ("BellSouth") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, this Request For Specified Confidential Classification and states the following:

1. On November 8, 2005, the Staff of the Florida Public Service Commission (the "Staff") sent out its First Data Request to BellSouth. On November 22, 2005, BellSouth responded to Staff's First Data Request with the exception of Item No. 3. On December 2, 2005, BellSouth sent its supplemental response to Staff's First Data Request, Item No. 3. On December 8, 2005, the Staff sent out its Second Data Request to BellSouth. On December 16, 2005, BellSouth responded to Staff's Second Data Request with the exception of Item Nos. 1 and 2. On January 9, 2006, BellSouth sent its supplemental response to Staff's Second Data Request, Nos. 1 and 2. On February 10, 2005, BellSouth filed comments to Staff's *Draft* of the BellSouth Chapter of the Review of Pole Inspection and Maintenance Practices of BellSouth, Sprint and Verizon.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Specified Confidential Classification for the responses, filings and workpapers, which contain, among other things, audit related and competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

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.


4. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

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

Respectfully submitted this 23rd day of February, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

BellSouth Telecommunications, Inc.
Pole Inspection Audit
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**BELLSOUTH'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION IN
THE REVIEW OF POLE INSPECTION AND MAINTENANCE PRACTICES**

BellSouth requests that the following information contained in documents created and/or produced in connection with the Commission's *Review of Pole Inspection and Maintenance Practices of BellSouth, Sprint and Verizon* be treated as confidential and proprietary and, thus, exempt from the public inspection and examination provisions of Section 119.07, Florida Statutes.

Explanation of Confidential and Proprietary Information

1. The information concerns competitive business information and relates to parity issues. Disclosure of the terms of pole attachment/inspection contracts and other pole-related information could be used by third parties to draw conclusions regarding pole rates, fees and revenues; and could impair the Company's ability to contract for goods and services on favorable terms. Disclosure of this information may also violate confidentiality provisions contained in individual agreements. Accordingly, this information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.
2. The information constitutes proprietary information regarding BellSouth training and prevention programs and practices. BellSouth incurs the expense of developing these programs and practices. It is unfair to allow competitors to have free access to these materials. Accordingly, this information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.
3. The information relates to internal auditing controls and reports of internal auditors and, as such, is entitled to confidential classification pursuant to Section 364.183, Florida Statutes.

LOCATION

REASON

BELLSOUTH'S RESPONSE TO DR-1 OF POLE AUDIT:

Page 4, the total pole figures cited in lines 10 – 12	1
Attachments to Response to DR-1:	
Page 13 (Attachment 3), lines 7 - 44 (Names of Companies)	1
Page 14 (Attachment 4), lines 7 - 45 (Names of Companies)	1
Page 15 (Attachment 4), lines 1 - 48 (Names of Companies)	1
Page 16 (Attachment 4), lines 1 and 2 (Names of Companies)	1
Page 18 (Attachment 5), all numbers except grand total in bottom right corner	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
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Page 19 and 20 (Attachment 6)	1
Pages 21 - 37 (Attachment 7)	1
Disk: BellSouth claims that the contents of all the agreements contained on the disk produced in response to DR-1, except the four CLEC agreements, are confidential. The confidential agreements include the joint use and license agreements listed in Attachments 3 and 4 to the DR-1 Response, and the Osmose contract. BellSouth is enclosing 2 new disks with this Claim of Confidentiality: one that contains the four CLEC agreements and one that contains all of the confidential agreements.	1

BELLSOUTH'S SUPPLEMENTAL RESPONSE TO DR-1 (ITEM 3)

Page 2, lines 14 – 17, 19 – 23 and 25 - 28	3
Pages 3 – 45 (the audit documents attached to the Supplemental Response)	3

BELLSOUTH'S RESPONSE TO DR-2 OF POLE AUDIT:

Pages 8 – 11 (Attachment A)	2
Pages 12 – 30 (Attachment B)	2
Pages 31 – 66 (Attachment C)	2

STAFF'S DRAFT COPY OF THE BELLSOUTH CHAPTER OF *REVIEW OF POLE INSPECTION AND MAINTENANCE PRACTICES OF BELLSOUTH, SPRINT AND VERIZON* (forwarded to BellSouth on February 3, 2006):

Page 1, line 22 – the exact spending cap of the Osmose contract	1
Page 1, line 24 – the four cited annual expense amounts	1
Page 1, line 25 – the exact dollar range of the Osmose fees	1
Page 4, the total pole figures cited in lines 10 – 12	1
Page 5, the total pole figure cited in line 23	1

STAFF'S WORKPAPERS/STAFF'S WORKPLAN COLUMN AUDIT NOTES

Page 3, Item 9 – references to all prices/dollar amounts relating to BellSouth's contract with Osmose	1
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ATTACHMENT B

**BellSouth Telecommunications, Inc.
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**BELLSOUTH'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION IN
THE REVIEW OF POLE INSPECTION AND MAINTENANCE PRACTICES**

TWO REDACTED COPIES

ATTACHMENT C

BellSouth Telecommunications, Inc.
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**BELLSOUTH'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION IN
THE REVIEW OF POLE INSPECTION AND MAINTENANCE PRACTICES**

ONE HIGHLIGHTED COPY