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Legal Department

Manuel A. Gurdian
Attorney

06 OCT 26 PM 4:24

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

COMMISSION
CLERK

October 26, 2006

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. 060598-TL: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.051(4), to Recover 2005 Tropical System Related Costs and Expenses**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses to Citizens' First Request for Production of Documents Nos. 1, 2, 3, 4, 5 and 7.

Copies of this letter will be served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian
Manuel A. Gurdian

cc: Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 060598-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 26th day of October, 2006 to the following:

Patrick Wiggins
Adam Teitzman
Felicia Banks
Theresa Lee Eng Tan
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
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NuVox Communications, Inc.
Susan J. Berlin (+)
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Greenville, SC 29601
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Manuel A. Gurdian

(+) Signed Protective Agreement

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Represents NuVox
Represents CompSouth

ORIGINAL

FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to recover 2005 tropical system) Docket No. 060598-TL
related costs and expenses, by BellSouth)
Telecommunications, Inc.)
_____) Filed: October 26, 2006

**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. Pursuant to Order No. 06-0783-PCO-TL, BellSouth is obligated to provide a copy of discovery responses served on other parties to Commission Staff.
2. On September 11, 2006, Florida's Citizens (Citizens or OPC) served its First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos. 1-10) upon BellSouth.
3. On October 5, 2006 BellSouth Telecommunications, Inc. filed its Response and Objections to Citizens' First Set of Interrogatories (Nos. 1-4) and First Request for Production of Documents (Nos.1-10).
4. On October 6, 2006 BellSouth filed a Notice of Intent as certain documents provided in response to Citizens' First Request for Production, Nos. 1, 2, 3, 4, 5 and 7 contain information designated as "confidential" and is proprietary to BellSouth.
5. Because the information provided in BellSouth's response contains confidential and proprietary information, BellSouth is now filing this Request for Specified Confidential Classification pursuant to Section 364.24 and Section 364.183, Florida Statutes. Accordingly, it

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should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

6. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information and identifies the location of the information designated confidential.

7. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the document containing the confidential information.

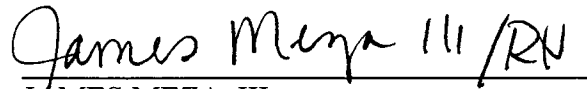
8. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

9. 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.

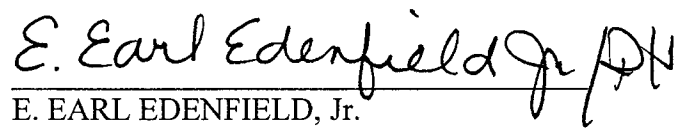
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 26th day of October, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

 James Meza III /RU

JAMES MEZA, III
MANUEL A. GURDIAN
c/o Nancy H. Sims
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(305) 347-5558

 E. Earl Edenfield Jr. /RH

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Dkt No. 060598-TL
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO CITIZENS' FIRST REQUEST FOR PRODUCTION NOS. 1,2,3,4,5 AND 7 FILED
OCTOBER 6, 2006**

Explanation of Proprietary Information

1. This information contains confidential, proprietary business information of BellSouth. BellSouth strives to keep this information confidential and not publicly disclose the information. This information contains detailed budget, financial and strategic information for BellSouth. Disclosure of revenue accounting and business costs could give competitors a clear picture of the resources required to provide services. Knowledge of such resource requirements could harm the competitive interests of BellSouth.
2. The information requested contains a listing of in service/out of service access lines down per central office. This information is proprietary and confidential business information used by BellSouth in conducting its business, and not commonly known by or available to the public. Such information is of a competitive nature in that it could be used as an indicator of market share, therefore, this information is entitled to confidential classification.

ATTACHMENT A

BellSouth Telecommunications, Inc.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO CITIZENS' FIRST REQUEST FOR PRODUCTION NOS. 1,2,3,4,5 AND 7 FILED
OCTOBER 6, 2006

<u>POD NO. 1</u>	<u>Reason</u>
Entire Document	1
<u>POD No. 2</u>	
Entire Document	1
<u>POD No. 3</u>	
Entire Document	1
<u>POD No. 4</u>	
Entire Document	1
<u>POD No. 5</u>	
Entire Document	2
<u>POD No. 7</u>	
Entire Document	1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
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10/26/06**

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OCTOBER 6, 2006**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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10/26/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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OCTOBER 6, 2006**

ONE HIGHLIGHTED COPY