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Manuel A. Gurdian  
Attorney

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

COMMISSION  
CLERK

November 13, 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: **BellSouth Audit of 2005 Storm Costs; Docket No. 060598-TL;  
ACN 06-255-1-1; Additional Confidential Workpapers**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's audit workpapers, which we ask that you file in the captioned docket and audit.

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

Sincerely,

*Manuel A. Gurdian*  
Manuel A. Gurdian

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_

ECR \_\_\_\_\_

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SEC 1 \_\_\_\_\_

OTH 1 copy  
records

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

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 13th day of November, 2006 to the following:

Patrick Wiggins  
Adam Teitzman  
Felicia West  
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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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: November 13, 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. On September 12, 2006, the Staff of the Florida Public Service Commission (Staff) notified BellSouth via letter that it would be conducting an audit of BellSouth's 2005 Storm Costs.

2. On October 23, 2006, Staff notified BellSouth that Audit Control No. 06-255-1-1 was completed and provided BellSouth with the audit workpapers that Staff had utilized to report their audit findings. These documents were being maintained in a Temporary Confidential Status.

3. Because the information provided to Staff in BellSouth's response to various audit requests contain 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 should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

4. 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.

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

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

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 13<sup>th</sup> day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

James Meza III / RN

JAMES MEZA, III

MANUEL A. GURDIAN

c/o Nancy H. Sims

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
2005 Storm Costs Audit  
Request for Confidential Classification  
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11/13/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AUDIT WORKPAPERS  
PROVIDED BY BELL SOUTH IN RESPONSE TO THE 2005 STORM COSTS AUDIT**

**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. This information contains confidential, proprietary business information. In particular this information contains BellSouth internal policies and procedures for compensation.
3. This information contains drawings and information of BellSouth's network. This information is considered to be proprietary and confidential business information. Public disclosure of this information would impair BellSouth's ability to keep the communications network secure. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret.
4. This information contains confidential, proprietary business information of BellSouth and third-parties. BellSouth is contractually required to keep this information confidential and not publicly disclose the information.

In particular, this information contains a list of CLECs that BellSouth has interconnection agreements with and the number of wholesale lines of each. Florida Statutes Section 364.24, provides that "any telecommunications company shall not intentionally disclose customer account records except as authorized by the customer or as necessary for billing purposes, or required by subpoena, court order, other process of court, or as otherwise allowed by law."

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
 FPSC Dkt No. 060598-TL  
 2005 Storm Costs Audit  
 Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AUDIT WORKPAPERS  
 PROVIDED BY BELL SOUTH IN RESPONSE TO THE 2005 STORM COSTS AUDIT**

<b>Item</b>	<b>Description</b>	<b>Page</b>	<b>Location</b>	<b>Reason</b>
1	Summary Schedule of Storm Recovery Costs	10-1.3	Entire Page	1
2	Expense Portion of Costs for 2005 Named Storms	10-1.4	Entire Page	1
3	Capital Portion of Costs for 2005 Named Storms	10-1.5	Entire Page	1
4	Cost of Removal	10-1.6	Entire Page	1
5	Monthly Expenses	10-1.7→10-1.19	Entire Pages	1
6	Summary of Other	10-1.20	Entire Page	1
7	Exempt and NonExempt Overtime	10-5.2→10-5.16	Entire Pages	2
8	75 Spans of Cable	10-10.4→10-10.10	Entire Pages	3
9	CD containing company response to Item 1 of Document Requests 19,20,21,22	10-19.2	Entire CD	1
10	Supplemental Response to document request 19	10-19.6	Lines 1,2,3	1
11	Supplemental Response to document request 22	10-22.2 10-22.3	Lines 1-4,9-12 Lines 1-3	1
12	CD containing company responses to Document Request 18, 23	10-23.2	Entire CD	1
13	CD containing company responses to Document Request 24	10-24.2	Entire CD	1
14	Audit prepared Schedules of Active CLECS from Subpeoned Information, Document Number 08753-06	46-1.1→ 46-1.6	Customer Name Column, All pages	4
15	Audit prepared Schedules of Active CLECS from Subpeoned Information, Document Number 08753-06	46-2.1→ 46-2.10	Customer Name Column, All pages	4
16	CD containing company response to Document Requests 27,29,32	10-27.3	Entire CD	1
17	Printout from CD in item 16	47-1	Entire Page	1