ORIGINAL

	Legal Department
Manuel A. Gurdian Attorney	· -
BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5561	COMMISSION CLERK
December 1, 20	06 📻 🖄

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

Re: <u>Docket No. 060598-TL</u>: 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 *Revised* Responses to Citizens' First Set of Interrogatories, Item No. 4 and First Request for Production of Documents, Item No. 2, which we ask that you file in the captioned docket.

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

, (entificate of Service.
CMP	Sincerely,
COM	$M\Omega$
CTR	Manuel A. Gurdian
ECR	manasi 71. Saraian
GCL / c	c: Jerry D. Hendrix E. Earl Edenfield, Jr.
OPC	James Meza III
RCA	
SCR	
SGA	RECENED & FILED
SEC	
OTH 100M	FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

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 1st day of December, 2006 to the

following:

Patrick Wiggins
Adam Teitzman
Felicia West
Theresa Lee Eng Tan
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Florida Public Service
Commission
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Represents NuVox
Represents CompSouth

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Phone: 864-331-7323
FAX: 864-672-5105
sberlin@nuvox.com

Manuel A. Gurdian

(+) Signed Protective Agreement



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: December 1, 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 December 1, 2006, BellSouth filed a Revised Response to Citizen's First Set of Interrogatories, Item No. 4 and First Request for Production of Documents, Item No. 2, dated September 11, 2006.
- 3. Because the information provided in the revised 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 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.
- 5. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the document containing the confidential information.

DOCUMENT NUMBER-DATE

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- 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 1st day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

JAMES MEZA, III

MANUEL A. GURDIAN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

É. EARL EDENFIELD, Jr.

Suite 4300, BellSouth Center

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0763

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Dkt No. 060598-TL Request for Confidential Classification Page 1 of 2 12/1/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED RESPONSE TO CITIZEN'S 1ST SET OF INTERROGATORIES, ITEM NO. 4, (ATTACHMENT) AND FIRST REQUEST FOR PRODUCTION, ITEM NO. 2, FILED DECEMBER 1, 2006

Explanation of Proprietary Information

1. 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. Specifically, this information contains confidential business and financial information, including, but not limited to, forecasts, and hypothetical situations.

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Dkt No. 060598-TL Request for Confidential Classification Page 2 of 2 12/1/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED RESPONSE TO CITIZEN'S 1ST SET OF INTERROGATORIES, ITEM NO. 4, (ATTACHMENT) AND FIRST REQUEST FOR PRODUCTION, ITEM NO. 2, FILED DECEMBER 1, 2006

Revised Interrogatory No. 4 (Attachment)	<u>Reason</u>
Capital Column	1
Intrastate Capital Column	i
Incremental Expense Column	1
Incremental Intrastate Expense Column	1

<u>POD NO. 2</u>	Reason
Entire Page 1	1
Amounts Column, Page 2	1
Lines 1 and 2 of "Note", Page 2	1
Incremental Intrastate Expense Column, Page 3	1
Columns B,C,D,E,F,G,H and I, Page 4	1

ATTACHMENT B

BellSouth Telecommunications, Inc. FPSC Dkt No. 060598-TL Request for Confidential Classification Page 1 of 1 12/1/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED RESPONSE TO CITIZEN'S 1ST SET OF INTERROGATORIES, ITEM NO. 4, (ATTACHMENT) AND FIRST REQUEST FOR PRODUCTION, ITEM NO. 2, FILED DECEMBER 1, 2006

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

BellSouth Telecommunications, Inc. FPSC Dkt No. 060598-TL Request for Confidential Classification Page 1 of 1 12/1/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED RESPONSE TO CITIZEN'S 1ST SET OF INTERROGATORIES, ITEM NO. 4, (ATTACHMENT) AND FIRST REQUEST FOR PRODUCTION, ITEM NO. 2, FILED DECEMBER 1, 2006

ONE HIGHLIGHTED COPY