

E. EARL EDENFIELD, JR.  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0763

ORIGINAL

March 12, 2001

RECEIVED-FPSC  
01 MAR 12 PM 4:45  
RECORDS AND REPORTING

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **000075-TP (Generic ISP) (Phase I)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification regarding BellSouth's Response to Commission Staff's Request for Production of Documents, Item No. 1 and Commission Staff's First Set of Interrogatories, Item No. 1, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*E. Earl Edenfield, Jr.*

E. Earl Edenfield, Jr.

(2)

Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

RECEIVED & FILED

*Mur*

FPSC-BUREAU OF RECORDS

(x-ref. 02297-01)  
This confidentiality request was filed by or for a "telco" for DN 03149-01. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE

03148 MAR 12 01

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE**  
**Docket No. 000075-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Hand Delivery(\*) and U.S. Mail this 12th day of March, 2001 to the following:

Felicia Banks (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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246 E. 6th Avenue, Suite 100  
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mgross@fcta.com

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Martin P. McDonnell (+)  
Rutledge, Ecenia, Purnell & Hoffman  
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Fax: (850) 681-6515  
Represents US LEC  
Represents Level 3  
Represents Allegiance  
Represents TCG

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Attn: Regulatory & Interconnection  
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Morton Posner, Esq. (\*)  
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Represents Cox Communications

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Gerry, Friend & Saprnov, LLP  
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Tel. No. (770) 399-9500  
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Fax. No. (720) 888-5134

Dana Shaffer  
Vice President  
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105 Molly Street, Suite 300  
Nashville, Tennessee 37201-2315  
Tel. No. (615) 777-7700  
Fax. No. (615) 345-1564

*E. Earl Edenfield, Jr.*  
E. Earl Edenfield Jr. (27)

**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into appropriate methods ) Docket No. 000075-TP  
to compensate carriers for exchange of )  
traffic subject to Section 251 of the )  
Telecommunications Act of 1996 ) Filed: March 12, 2001  
\_\_\_\_\_)

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

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

1. On February 19, 2001, BellSouth filed its Responses to the First Request for the Production of Documents and First Set of Interrogatories filed in this docket by the Florida Public Service Commission Staff ("Staff"). At the same time, BellSouth filed a Notice of Intent to Request Confidential Classification of certain information contained therein. BellSouth is now filing a Request for Confidential Classification of the subject information.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A an identification of the specific locations of the confidential information in both the interrogatory response and in the responsive documents. Attachment A also contains the specific justification for the request for confidential classification

3. BellSouth has appended to this Request as Attachment B a redacted paper copy of the documents for which confidential classification is requested.

4. BellSouth has appended to this Request as Attachment C a highlighted paper copy of the documents for which confidential classification is requested.

5. The information requested concerns ALEC proprietary information. This information is treated as Proprietary and Confidential Business information by BellSouth. This data is valuable to ALECs and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

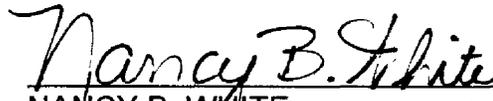
6. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

7. The original of this Notice has been filed with the Division of Records and Reporting, and a copy has been served on the Division requesting the information.

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

Respectfully submitted this 12th day of March, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



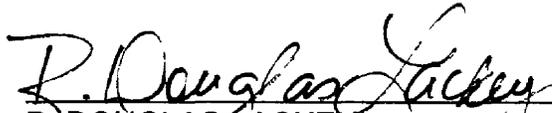
NANCY B. WHITE (21)

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558



R. DOUGLAS LACKEY (22)

E. EARL EDENFIELD JR.

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250509

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000075-TP  
Request for Confidential Classification  
Page 1 of 2  
3/12/01**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES (ITEM NO. 1) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 1) FILED FEBRUARY 19, 2001 IN FLORIDA DOCKET NO. 000075-TP**

#### **Explanation of Proprietary Information**

1. The information contained in Interrogatory No. 1 and Request for Production No. 1 is proprietary to BellSouth and includes information containing customer specific information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000075-TP  
Request for Confidential Classification  
Page 2 of 2  
3/12/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S FIRST SET OF INTERROGATORIES (ITEM NO. 1) AND FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 1) FILED FEBRUARY  
19, 2001 IN FLORIDA DOCKET NO. 000075-TP**

**Interrogatory No. 1**

<u>Line No.</u>	<u>Reason</u>
Lines 1-6	1

**POD No. 1**

<u>Page No.</u>	<u>Line No.</u>	<u>Reason</u>
Pg 1	Lines A	1
	Lines 1,2,5,7	1
	Lines 1-4	1
	Line B	1
Pg 2	To:	1
	Lines 3,4,6,8	1
Pgs 3,4,5	Entire Page	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000075-TP  
Request for Confidential Classification  
Page 1 of 1  
3/12/01**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S FIRST SET OF INTERROGATORIES (ITEM NO. 1) AND FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (POD NO. 1) FILED FEBRUARY  
19, 2001 IN FLORIDA DOCKET NO. 000075-TP**

**Two Redacted Copies**

BellSouth Telecommunications, Inc.  
FPSC Docket No. 000075-TP  
Staff's 1<sup>st</sup> Set of Interrogatories  
January 30, 2001  
Item No. 1  
Page 1 of 1  
**PUBLIC**

**REQUEST:** In the direct testimony of David P. Scollard, page 5, beginning at line 7, he states that "BellSouth has not been able to obtain the ISP numbers used by ALECs in generating bills sent to BellSouth." What ALECs has BellSouth specifically asked to provide such information and when?

**RESPONSE:** On many occasions, BellSouth has requested that ALECs provide the telephone numbers that ALECs are using to serve ISPs. Many of these occasions were not documented and can not be recalled. However, several specific examples of this are as follows:

- 1 XXXXXX - January, 2001 (some telephone numbers provided)
- 2 XXXXXX - (2000) Indicated that it did not serve ISPs.
- 3 XXXXXX - (1998) Indicated that they served no ISPs
- 4 XXXXXX - (1999) - Refused to provide list of ISP numbers.
- 5 XXXXXX - (1998) Refused to provide ISP numbers.
- 6 XXXXXX - (1998) Refused to provide ISP numbers.

**RESPONSE PROVIDED BY:** David Scollard  
Manager  
600 N 19<sup>th</sup> St.  
Birmingham, AL 35203

BELLSOUTH TELECOMMUNICATIONS, INC.

FPSC DKT NO 000075-TP

STAFF'S 1<sup>ST</sup> REQUEST FOR PRODUCTION OF DOCUMENTS

POD NO. 1

**PROPRIETARY**

A

January 30, 2001

BellSouth Interconnection Purchasing Center  
Richard McIntire  
600 N. 19<sup>th</sup> Street, 7<sup>th</sup> Floor  
Birmingham, AL 35203

Mr. McIntire:

1  
2 Enclosed are [redacted] 10 digit Internet Service Provider access telephone numbers that are used to exclude usage from being billed to BellSouth in Florida. [redacted] excludes calls originated by BellSouth and terminating to these numbers from Access Billing to BellSouth.)

4 This data exchange is made pursuant to the confidentiality provisions in Section 9 of the General Terms and Conditions of the BellSouth [redacted] Interconnection Agreement.

7 The information is provided as part of a mutual exchange of 10 digit number information between [redacted] and BST for the purpose of validating ISP usage.

1  
2  
3  
4

If you have questions, please contact me directly.

Thank you,

B

7



Interconnection Purchasing Center  
600 North 19th Street 7th Floor  
Birmingham, Alabama 35203

Date: January 31, 2001

To:

Subject : Exchange of 10 Digit Numbers

Attached is a list of BellSouth 10 digit numbers pulled from BellSouth's ISP tracker database as BellSouth numbers in Florida which are used to exclude usage from being billed to [REDACTED] (Calls originated by [REDACTED] and terminating to these numbers are excluded from Access Billing to [REDACTED] by BellSouth.)

This data exchange is made pursuant to the confidentiality provisions in Section 9, General Terms and Conditions, of the BellSouth [REDACTED] Interconnection Agreement.

The information is provided as part of a mutual exchange of 10 digit number information between [REDACTED] and BST for the purpose of validating ISP usage in order to resolve existing disputes between the companies, determine Cap calculation and payment of future invoices/bills.

If you have questions, please contact me at 205 714-0246 or Linda Riley at 205 714-0234.

Sincerely,

Richard McIntire  
Operations Director

Attachments

Proprietary Information – Exchanged Pursuant to Confidentiality Provisions in Section 9, General Terms and Conditions, of the BellSouth Media One Interconnection Agreement

3

PRIVATE/PROPRIETARY/LOCK  
No disclosure outside BellSouth except by written agreement

Proprietary Information – Exchanged Pursuant to Confidentiality Provisions in Section 9, General Terms and Conditions, of the BellSouth Media One Interconnection Agreement

J

PRIVATE/PROPRIETARY/LOCK  
No disclosure outside BellSouth except by written agreement

Proprietary Information - Exchanged Pursuant to Confidentiality Provisions in Section 9, General Terms and Conditions, of the BellSouth Media One Interconnection Agreement

5

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PRIVATE/PROPRIETARY/LOCK  
No disclosure outside BellSouth except by written agreement

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