

PATRICK W. TURNER  
General Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0761

September 10, 2001

Mrs. 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. 010740-TP (IDS)

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for BellSouth's late filed Exhibit KLA-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,

*Patrick W. Turner*  
Patrick W. Turner (UA)

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

DOCUMENT NUMBER-DATE

11299 SEP 10 01

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 010740-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
by Electronic Mail and Federal Express this 10th day of September, 2001 to the  
following:

Mary Anne Helton  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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Represents IDS

Michael Noshay, President  
IDS Long Distance, Inc.  
n/k/a IDS Telcom, LLC  
1525 N.W. 167th Street  
Second Floor  
Miami, Florida 33169  
Tel. No. (305) 913-4000  
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[mnoshay@idstelcom.com](mailto:mnoshay@idstelcom.com)

  
\_\_\_\_\_  
Patrick Turner (KS)

**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint of IDS Long Distance, Inc., )  
n/k/a IDS Telecom, L.L.C., Against )  
BellSouth Telecommunications, Inc., and )  
Request for Emergency Relief )  
\_\_\_\_\_)

Docket No. 010740-TP

Dated: September 10, 2001

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

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

1. On August 20, 2001, BellSouth Telecommunications, Inc. filed Direct Testimony of Ken Ainsworth with its Late-Filed Exhibit KLA-1 to that Direct Testimony along with a Notice of Intent to Request Specified Confidential Classification.
2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in Direct Testimony of Ken Ainsworth on page 6 (number and analysis of IDS disconnect orders for May 2000) and Exhibit KLA-1 contain competitive business information that is considered confidential and proprietary to BellSouth. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential business information. A more specific description of this information is contained in Attachment A. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

DOCUMENT NUMBER-DATE

11299 SEP 10 01

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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 is 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 10th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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NANCY B. WHITE (KA)  
JAMES MEZA III  
c/o Nancy Sims  
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(305) 347-5558

*R. Douglas Lackey*

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R. DOUGLAS LACKEY (KA)  
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## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 010740-TP  
Request for Confidential Classification  
Page 1  
9/10/01

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF DIRECT TESTIMONY AND EXHIBIT OF KEN L. AINSWORTH AS FILED ON AUGUST 20, 2001 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 010740-TP

#### Explanation of Proprietary Information

1. This information is proprietary to BellSouth and includes information containing customer specific proprietary information. The Commission has always zealously protected customer proprietary and business proprietary 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 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

#### PAGE NO.

#### REASON

6, lines 4,5  
Exhibit KLA-1 (entire document)

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