

PATRICK W. TURNER
General Attorney

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

September 14, 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 Response to IDS' Second Request for Production of Documents, Nos. 32, 33, and 39 and IDS' Second Set of Interrogatories, Item No. 33, which we ask that you file in the captioned docket. We attempted to file a Notice of Intent yesterday, September 13, 2001, but were unsuccessful due to evacuations around our office and extremely heavy traffic. In light of these facts, we are not filing a Notice of Intent but this Request for Specified Confidential Classification.

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 (KH)

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

DOCUMENT NUMBER-DATE

11477 SEP 14 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 Hand Delivery (*), Electronic Mail and Federal Express this 14th 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
Te. No. (850) 413-6096
mhelton@psc.state.fl.us

Suzanne Fannon Summerlin (+) (*)
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summerlin@nettally.com
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
Fax No. (305) 913-4039
mnoshay@idstelcom.com



Patrick Turner (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of IDS Long Distance, Inc.,) Docket No. 010740-TP
n/k/a IDS Telecom, L.L.C., Against)
BellSouth Telecommunications, Inc., and)
Request for Emergency Relief)
_____) Dated: September 14, 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 September 14, 2001, BellSouth Telecommunications, Inc. filed its Responses to IDS' Second Request for Production of Documents of which Responses to Nos. 32, 33, and 39 contain proprietary information and Responses to IDS' Second Set of Interrogatories of which Item 33 contains proprietary information. A Notice of Intent to Request Specified Confidential Classification will not be filed, due to the essence of time and facts stated in cover letter. BellSouth is filing this Request for Specified Confidential Classification instead.

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 responses to Production of Documents Nos. 32, 33, and 39, and Interrogatories Item No. 33 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.

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 14th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White

NANCY B. WHITE (LA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

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(305) 347-5558

Patrick W Turner

R. DOUGLAS LACKEY (LA)

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410246

**Attachment A
Index of Proprietary Documents**

**BellSouth Telecommunications, Inc.
FPSC Docket No. 010740-TP
IDS' 2nd Set of Interrogatories and 2nd Request for Production of
Documents**

Entire Document Proprietary:

**Production of Documents Item No. 32, 33
Interrogatory Item No. 33 (Attachment)**

This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business, and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, BellSouth's DOE and SONGS training packages, BellSouth's User Requirements Documentation for LENS, user manuals, and similar material provide system access instructions, feature, function and system capability descriptions, and user instructions that are trade secret to BellSouth.

Furthermore, this information has been prepared at great cost to BellSouth, and therefore, others should not be permitted to gain the non-competitive benefit from not having to develop these instructions and materials themselves. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

Entire Document Proprietary:

Production of Documents Item No. 39

This material 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 material contains customer specific information, including the number and types of IDS' end user orders processed by BellSouth for specific time periods. Such information is of a competitive nature and could be used to the detriment of BellSouth's customer, IDS, by companies competing with IDS. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.