

NANCY B. WHITE
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

September 17, 2001

Mrs. Blanca S. Bayó
Director, 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 Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for responses to IDS' First Request for Production of Documents Nos. 4, 11, 16, 17, 18, 19, and 22 and responses to IDS' First Set of Interrogatories Nos. 2, 9, and 10, 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,


Nancy B. White
(21)

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

DOCUMENT NUMBER-DATE

11550 SEP 17 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 and Federal Express this 17th 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 (+) (*)
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax No. (850) 656-5589
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



Nancy B. White (2)

(+) 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)	
	Filed: September 17, 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 4, 2001, BellSouth filed its Responses and Objections to IDS' First Request for Production of Documents and First Set of Interrogatories. A Notice of Intent to Request Confidential Classification was also filed this same day for responses to Request for Production of Documents Nos. 1, 4, 11, 16, 17, 18, 19, and 22 and responses to Interrogatories Nos. 2, 9, and 10 which contain information that is considered confidential and proprietary to BellSouth. At this time, BellSouth is hereby withdrawing its request for confidentiality for Request for Production of Documents No. 1.

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 Request for Production of Documents Nos. 4, 11, 16, 17, 18, 19, and 22 and responses to Interrogatories Nos. 2, 9, and 10 contains confidential business information, customer specific information and 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 17th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (22)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY

PATRICK W. TURNER (22)

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0747

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Attachment A

**BellSouth Telecommunications, Inc.
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IDS First Interrogatories and
First Request for Production of Documents
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO IDS' 1ST SET OF INTERROGATORIES (Item Nos. 2, 9
and 10) AND IDS' 1ST REQUEST FOR PRODUCTION OF DOCUMENTS (Item
Nos. 4, 11, 16, 17, 18, 19 and 22)**

1. The information requested contains practices/procedures utilized by BellSouth to conduct business. This information, if released, would allow BellSouth's competitors to have free access to certain intellectual property which was developed at significant expense to BellSouth. BellSouth's competitors can use this information to develop their own strategies without the burden and expense of developing this property for themselves. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and the information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes. In addition, this information, which BellSouth keeps as trade secrets, is valuable because it is used by BellSouth in conducting its business. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

2. 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 information on IDS' customers, IDS' customer order details, and IDS specific performance data reports. Such information is of a competitive nature and could be used to the detriment of BellSouth's customer, IDS, by companies competing with IDS. The Commission has always protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

Attachment A

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3. This material is proprietary and confidential business information used by BellSouth in conducting its business, and not commonly available to the public. Specifically, this information reflects BellSouth's average monthly billed revenues by specific service type as well as marketing compensation/incentive payments by those specific service types. As such, BellSouth's competitors can use this information to develop and target their marketing plans. The disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete. In addition, this information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, it is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act pursuant to Section 364.183, Florida Statutes.

Interrogatory Item No. 2 Attachment

<u>Location</u>	<u>Reason</u>
Entire Document	2

Interrogatory Item No. 9 Attachment

<u>Location</u>	<u>Reason</u>
Entire Document	2

Attachment A

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Request for Production of Documents, Item No. 4

<u>Location</u>	<u>Line/Col</u>	<u>Reason</u>
Page 1	Line 1	2
Page 2	Lines 1-9	2
Page 5	Line 1	2
Page 6	Lines 1-2	2
Page 7	Line 1	2
Page 8	Line 1	2
Page 9	Line 1	2

Request for Production of Documents, Item No. 11

<u>Location</u>	<u>Line/Col</u>	<u>Reason</u>
Pages 1 – 9	columns B –G; All lines	3
Page 10	columns B-C; All lines	3
Page 11	columns B-D; All lines	3
Page 12 – 13	Entire page	3
Page 14	columns B – G; All lines	3

Interrogatory, Item No. 10 and Request for Production of Documents, Item Nos. 16, 17, 18, 22

<u>Location</u>	<u>Reason</u>
Entire CD (all files)	2

Request for Production of Documents, Item No. 19

<u>Location</u>	<u>Reason</u>
Entire Document	1