

NANCY B. WHITE
General Counsel - Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
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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 Late Filed Deposition Exhibit Nos. 2, 3, 4, and 6 for Gloria Burr, Exhibit No. 1 for Ken Ainsworth and Exhibit No. 1 for Berlene Means, 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 (KA)

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

DOCUMENT NUMBER-DATE

11556 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
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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
Fax No. (305) 913-4039
mnoshay@idstelcom.com



Nancy B. White (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)	
_____)	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 August 31, 2001, BellSouth filed its Late Filed Deposition Exhibit Nos. 1, 2, 3, 4, 5, and 6 for Gloria Burr, Exhibit No. 1 for Berlene Means; Exhibit Nos. 1 and 2 for Ken Ainsworth and Exhibit No. 1 for Vickie Beachley. A Notice of Intent to Request Confidential Classification was also filed on this same day for Late Filed Deposition Exhibit Nos. 2, 3, 4, and 6 for Gloria Burr, Exhibit No. 1 for Ken Ainsworth and Exhibit No. 1 for Berlene Means which contain information that is considered confidential and proprietary to BellSouth.

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 BellSouth's Late Filed Deposition Exhibit Nos. 2, 3, 4, and 6 for Gloria Burr, Exhibit No. 1 for Ken Ainsworth and Exhibit No. 1 for Berlene Means 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 (KA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

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R. Douglas Lackey

R. DOUGLAS LACKEY (KA)

PATRICK W. TURNER

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**Attachment A
Index of Proprietary Documents**

**BellSouth Telecommunications, Inc.
FPSC Docket No. 010740-TP**

- **LATE FILED DEPOSITION EXHIBIT NOS. 2, 3, 4, AND 6 OF GLORIA BURR**
- **LATE FILED DEPOSITION EXHIBIT NO. 1 OF BERLENE MEANS**
- **LATE FILED DEPOSITION EXHIBIT NO. 1 OF KEN AINSWORTH**

1. 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 related to acceptance testing and/or trouble resolution logs for BellSouth's customer, IDS.

Furthermore, this material contains 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 internal procedures for LENS Retail/Resale to UNE Conversion, and Encore User Requirements for LENS Bulk Order to Allow Retail/Resale to UNE Conversion documentation provide system requirements, user requirements, methods and procedures used by BellSouth to perform acceptance testing.

Also, 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.

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 includes the scope, final report, and findings from BellSouth's Port Loop Combo testing of systems for IDS.

Such information is of a competitive nature in that it could be used as an indicator of technical systems development plans for an individual CLEC. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

3. This material contains 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, this material includes BellSouth's internal procedures to be used by BellSouth in operational support systems development and in LCSC operations. 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.

4. 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 information about BellSouth employees of a personal nature. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

Index of Proprietary Information

<u>Item</u>	<u>Reason No.</u>
Late Filed Deposition Exhibit No. 2 Gloria Burr Entire Document Proprietary	1
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