

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.)
n/k/a IDS Telcom, L.L.C., Against BellSouth) Docket No. 010740-TP
Telecommunications, Inc., and Request for)
Emergency Relief) Filed: September 18, 2001
_____)

**IDS TELCOM’S REQUEST FOR SPECIFIED
CONFIDENTIAL CLASSIFICATION**

Comes now, IDS Long Distance, Inc. n/ka/ IDS Telcom, LLC (“IDS”) and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification, and states the following.

1. On August 23 2001, IDS filed its Supplemental Responses to BellSouth’s First Request for Production of Documents Request Nos. 1-20 along with a Notice of Intent to Request Confidential Classification for information contained in Request Nos. 4, 5, and 11.
2. On August 24, 2001, IDS filed its Supplemental Responses to BellSouth’s First Set of Interrogatories Request Nos. 1-103. On August 27, 2001, IDS filed a Notice of Intent to Request Confidential Classification for information contained Request Nos. 4, 8, 18, 25, 35, 49, 50, and 59.
3. On September 6, 2001, IDS filed its Rebuttal Testimony along with a Notice of Intent to Request Confidential Classification for information contained in Exhibit AL-3 to Angel Leiro’s testimony. Exhibit AL-3 contains IDS’ supplemental discovery responses to BellSouth as provided on August 23 and 24, 2001, as described above. As a result, there are no new documents for which confidential

classification is required since the documents provided in Exhibit AL-3 are subsumed by the documents listed in paragraphs one and two above.

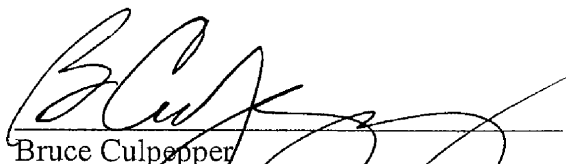
4. On September 6, 2001, IDS filed its Second Supplemental Responses to BellSouth's First Set of Interrogatories Request Nos. 1-103. On September 7, 2001, IDS filed a Revised Notice of Intent to Request Confidential Classification for information contained Request Nos. 8, 35, 49, 50, 59, 83, 92, 101, and 103.

5. IDS hereby files this Request for Specified Confidential Classification because the information contained in the responses include customer proprietary information which is clearly confidential and proprietary under Florida Statutes, Section 364.183 and 364.24.

6. Attachment A contains an index of the confidential documents. Attachment B is a sealed box containing one highlighted copy of the documents including those portions that are confidential. Attachment C contains two copies of the documents with the confidential information redacted.

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

Respectfully submitted this 18th day of September, 2001.



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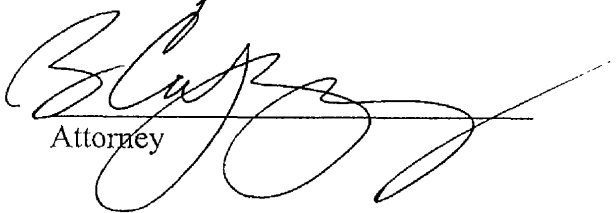
Attorneys for IDS Telcom, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing
was furnished via Hand Delivery this 18th day of September, 2001, to:

Mary Anne Helton
Staff Counsel
Florida Public Service Commission
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James Meza III, Esq.
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Attorney

ATTACHMENT A

Supplemental Responses to BellSouth Request for Production of Documents

- Tab 1 - POD No. 4
- Tab 2 - POD No. 5
- Tab 3 - POD No. 11

Supplemental Response to BellSouth's Interrogatories

- Tab 4 - Interrogatory No. 4
- Tab 5 - Interrogatory No. 8
- Tab 6 - Interrogatory No. 18
- Tab 7 - Interrogatory No. 25
- Tab 8 - Interrogatory No. 35
- Tab 9 - Interrogatory No. 49
- Tab 10 - Interrogatory No. 50
- Tab 11 - Interrogatory No. 59

Second Supplemental Responses to BellSouth Interrogatories

- Tab 12 - Interrogatory No. 5
- Tab 13 - Interrogatory Nos. 8, 35, 49, and 59
- Tab 14 - Interrogatory No. 50
- Tab 15 - Interrogatory No. 59
- Tab 16 - Interrogatory No. 83
- Tab 17 - Interrogatory No. 92
- Tab 18 - Interrogatory No. 101
- Tab 19 - Interrogatory No. 103

ATTACHMENT B

CONFIDENTIAL

ATTACHMENT C

Redacted Version