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October 10, 2001

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk  
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Florida Public Service Commission  
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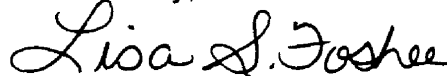
**Re: 960786-A-TL (Section 271)**

Dear Ms. Bayó:

Enclosed is BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's request for copies of BellSouth's Responses to Florida Digital Network's First Request for Production of Documents, Nos. 3(a), 3(c), 3(e), 3(f), 3(g) and 3(h) 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 by Electronic Mail and Federal Express as shown on the attached Certificate of Service.

Sincerely,



Lisa S. Foshee  
(2)

Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
Fred J. McCallum

DOCUMENT NUMBER-DATE  
12921 OCT 10 5  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth )  
Telecommunications, Inc.'s entry into ) Docket No. 960786-A-TL  
interLATA services pursuant to Section )  
271 of the Federal Telecommunications )  
Act of 1996. )  
\_\_\_\_\_ ) Filed: October 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 June 5, 2001, BellSouth Telecommunications, Inc. filed its Responses to Florida Digital Network's ("FDN") First Set of Interrogatories and First Request for Production of Documents. The Staff of the Florida Public Service Commission ("Staff") requested a copy of BellSouth's responses to Request for Production No. 3(a) thru 3(l). BellSouth's responses to FDN's First Request for Production of Documents Nos. 3(a), 3(c), 3(e), 3(f), 3(g), and 3(h) contain competitive business 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 responses to FDN's First Request for Production of Documents Nos. 3(a), 3(c), 3(e), 3(f), 3(g), and 3(h) 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.

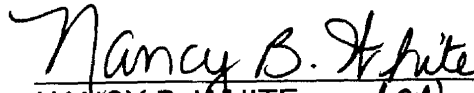
4. Appended hereto as Attachment B is two copies of the requested documents with the confidential information deleted.

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 10th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (28)


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c/o Nancy Sims

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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 960786-A-TL  
Request for Confidential Classification  
Page 1 of 3  
10/10/01**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO FLORIDA DIGITAL NETWORK'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 3 (a), (c), (e), (f), (g) and (h) FILED JUNE 5, 2001 IN FLORIDA DOCKET NO. 960786-A-TL**

#### **Explanation of Proprietary Information**

1. The subject information requested includes competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to sensitive marketing information developed at significant expense to BellSouth. Competitors would then have an advantage in bidding for such business since they would have few, if any, expenses such as market research and market development to recover, and would bid below BellSouth's cost level. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.
2. The subject information includes BellSouth's business plans and other confidential business information of BellSouth. If this information were disclosed publicly, it would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183.

## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 960786-A-TL  
Request for Confidential Classification  
Page 2 of 3  
10/10/01

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO FLORIDA DIGITAL NETWORK'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS NOs. 3 (a), (c), (e), (f), (g) and (h) FILED JUNE 5, 2001 IN FLORIDA DOCKET NO. 960786-A-TL

#### **POD No. 3 (a)**

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

#### **POD No. 3 (c)**

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

#### **POD No. 3 (e)**

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

#### **POD No. 3 (f)**

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

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 960786-A-TL  
Request for Confidential Classification  
Page 3 of 3  
10/10/01**

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TO FLORIDA DIGITAL NETWORK'S FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS NOs. 3 (a), (c), (e), (f), (g) and (h) FILED JUNE 5, 2001 IN FLORIDA  
DOCKET NO. 960786-A-TL**

**POD No. 3 (g)**

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

**POD No. 3 (h)**

| <u>Location/Column</u> | <u>Reason</u> |
|------------------------|---------------|
| Access Lines Column    | 2             |

**CERTIFICATE OF SERVICE  
DOCKET NO. 960786-A-TL**

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

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October 10, 2001

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Florida Public Service Commission  
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