Lisa S. Foshee General Attorney

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0754

October 11, 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: 960786-A-TL (Section 271)

Dear Mrs. Bayó:

Enclosed is the original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Late-Filed Deposition Exhibit No. 1 for Keith Milner, 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 Federal Express as shown on the attached Certificate of Service.

Sincerely,

Lisa S. Foshee

**Enclosures** 

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

DOCUMENT NUMBER-DATE
12971 OCT 11 =
.FPSC-COMMISSION CLERK

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

### I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

Federal Express and this 11th day of October, 2001 to the following:

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Lisa S. Foshee

(+) Signed Protective Agreement

#### 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 11, 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 20, 2001, BellSouth Telecommunications, Inc. filed its Late-Filed Exhibit No. 1 to Keith Milner's Deposition. This Exhibit contains customer-specific 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 this information contains customer-specific information that BellSouth is required to treat as proprietary and confidential business information. 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 11th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

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#### ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-A-TL Request for Confidential Classification Page 1 of 2 10/11/01

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE LATE FILED DEPOSITION EXHIBIT NO. 1 OF KEITH MILNER, FILED SEPTEMBER 20, 2001 IN FLORIDA DOCKET NO. 960786-A-TL

## **Explanation of Proprietary Information**

1. This information contains ALEC specific information that BellSouth is required to treat as proprietary and confidential business information. The Commission has always zealously protected ALEC specific information in order to prevent a competitor of the ALEC from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes.

### **ATTACHMENT A**

BellSouth Telecommunications, Inc. FPSC Docket No. 960786-A-TL Request for Confidential Classification Page 2 of 2 10/11/01

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE LATE FILED DEPOSITION EXHIBIT NO. 1 OF KEITH MILNER, FILED SEPTEMBER 20, 2001 IN FLORIDA DOCKET NO. 960786-A-TL

### LATE FILED DEPOSITION EXHIBIT NO. 1

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