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Legal Department

JAMES MEZA III  
Attorney

01 OCT 12 PM 3:24

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

COMMISSION  
CLERK

October 12, 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 the Deposition Transcript of Mary K. Batcher along with Exhibit No. 2, 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,

*James Meza III*  
James Meza III (KA)

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

- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- LEG \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- RGO \_\_\_\_\_
- SEC \_\_\_\_\_
- SER \_\_\_\_\_
- OTH \_\_\_\_\_

This confidentiality request was filed by or for a "telco" for DN 13010-01. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 12304-01 & 12391-01)

RECEIVED & FILED  
*RM*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13009 OCT 12 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 Federal Express this 12th day of October, 2001 to the following:

Mary Anne Helton (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
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Tallahassee, FL 32399-0850  
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Suzanne Fannon Summerlin (+)  
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Tallahassee, Florida 32301  
Tel. No. (850) 656-2288  
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Represents IDS

Michael Noshay, President  
IDS Long Distance, Inc.  
n/k/a IDS Telcom, LLC  
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Miami, Florida 33131-1704  
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Fax. No. (305) 374-5095



James Meza III (KA)

(+) Signed Protective Agreement

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of IDS Long Distance, Inc.        )  
n/k/a IDS Telecom, L.L.C., Against                )  
BellSouth Telecommunications, Inc., and         )  
Request for Emergency Relief                     )  
\_\_\_\_\_ )        Filed: October 12, 2001

**BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR  
SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

1. On September 28, 2001, BellSouth filed a Notice of Intent for the Deposition Transcript and Deposition Exhibits of Mary K. Batcher. Portions of the deposition transcript for Mary K. Batcher and Deposition Exhibit No. 2 contain information that is considered confidential and proprietary to either BellSouth or IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C ("IDS").

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 portions of the deposition transcript of Mary K. Batcher and Exhibit No. 2 contain either IDS customer-specific information or confidential business information for third party vendors that is considered confidential and proprietary to BellSouth and IDS. A more specific description of this information is contained in Attachment A.

3. BellSouth and IDS have 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 12th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (CA)

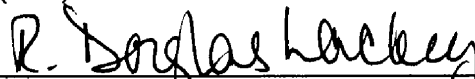
JAMES MEZA III

c/o Nancy Sims

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(305) 347-5558



R. DOUGLAS LACKEY (CA)

PATRICK W. TURNER

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0747

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 010740-TP  
Request for Confidential Classification  
Page 1  
10/12/01

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE DEPOSITION TRANSCRIPT OF MARY K. BATCHER AND DEPOSITION EXHIBIT NO. 2 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 010740-TP

### Explanation of Proprietary Information

1. This information is proprietary to IDS because it includes information containing IDS customer specific information. This information is also proprietary, because it contains proprietary business information relating to competitive interests and trade secrets for a third party vendor. The Commission has always zealously protected business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

#### PAGE NO.

#### REASON

64, lines 10, 11, 13-15	1
67, lines 17-18	1
68, lines 8, 11, 14, 17-18	1
69, lines 6, 9, 12, 15, 18-19	1
79, lines 9-14, 17-22	1
80, lines 1-4	1
128, lines 18-22	1
129, lines 1-7	1
Batcher Exhibit No. 2, lines 32-34	1