

Nancy B. White
General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

October 30, 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 Ms. Bayó:

Enclosed for filing in the above docket is the original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Supplemental Response to Florida Digital Network's First Request for Production of Documents, Item No. 1.

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 of record as shown on the certificate of service.

Sincerely,


Nancy B. White (KA)

Enclosures

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

DOCUMENT NUMBER-DATE
13724 OCT 30 2001
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 30th day of October, 2001 to the following:

Mr. Brian Sulmonetti (+)
LDDS WorldCom Communications
Suite 3200
6 Concourse Parkway
Atlanta, GA 30328
Tel. No. (770) 284-5493
Fax. No. (770) 284-5488
brian.sulmonetti@wcom.com

Charles J. Beck
Office of Public Counsel
111 W. Madison Street
Suite 812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax No. (850) 488-4992
Beck.Charles@leg.state.fl.us

Floyd R. Self, Esq. (+)
Messer Law Firm
215 South Monroe Street
Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents LDDS/ACSI
fself@lawfla.com

Richard D. Melson (+)
Hopping Green Sams & Smith
123 South Calhoun Street
P.O. Box 6526
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Represents MCI, Rhythms
RMelson@hgss.com

Vicki Gordon Kaufman (+)
Joseph A. McGlothlin (+)
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, Florida 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Represents FCCA
Represents NewSouth
Represents KMC
Represents NuVox Comm.
Represents ACCESS
Represents XO
Represents Z-Tel
vkaufman@mac-law.com
jmcglothlin@mac-law.com

Susan S. Masterton (+)
Sprint Communications Co.
Post Office Box 2214 (zip 32316-2214)
1313 Blair Stone Road
Tallahassee, FL 32301
Tel. (850) 599-1560
Fax (850) 878-0777
susan.masterton@mail.sprint.com

Beth Keating, Staff Counsel
MaryAnne Helton
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
mhelton@psc.state.fl.us

Scott Sapperstein
Intermedia Comm., Inc.
One Intermedia Way
MCFLT-HQ3
Tampa, Florida 33647-1752
Tel. No. (813) 829-4093
Fax. No. (813) 829-4923
Sasapperstein@intermedia.com

Rhonda P. Merritt
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6342
Fax. No. (850) 425-6361
rpmerritt@ATT.com

James P. Lamoureux (+)
Senior Attorney
AT&T Communications of
the Southern States, Inc.
1200 Peachtree Street, N.E.
Atlanta, GA 30309
Tel. No. (404) 810-4196
Fax No. (404) 877-7648
jlamoureux@att.com

Kenneth A. Hoffman, Esq. (+)
Rutledge, Ecania, Underwood,
Purnell & Hoffman, P.A.
215 South Monroe Street
Suite 420
P.O. Box 551
Tallahassee, FL 32302
Tel No. (850) 681-6788
Fax. No. (850) 681-6515
Represents TCG
Represents US LEC
Ken@Reuphlaw.com

John R. Marks, III
215 South Monroe Street
Suite 130
Tallahassee, FL 32301
Tel. (850) 222-3768
Fax. (850) 561-0397
Represents BellSouth
JohnM@KMRlaw.com

Kenneth S. Ruth
Florida Director CWA
2180 West State Road 434
Longwood, FL 32779
Tel. (407) 772-0266
Fax. (407) 772-2516
Kruth@cwa-union.org

Marilyn H. Ash
MGC Communications, Inc.
3301 N. Buffalo Drive
Las Vegas, NV 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
rjoyce@shb.com
Represents Network Access Solutions

Michael Gross/Charles Dudley (+)
FCTA, Inc.
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676
mgross@fcta.com

Nanette Edwards
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
Tel. No. (256) 382-3856
Fax. No. (256) 382-3969
nedwards@itcdeltacom.com
Represented by Hopping Law Firm

Donna McNulty
MCI WorldCom
325 John Knox Road
Suite 105
Tallahassee, FL 32303-4131
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mculty@wcom.com

Network Access Solutions Corp.
100 Carpenter Drive
Suite 206
Sterling, VA 20164
Tel. No. (703) 742-7700
Fax. No. (703) 742-7706
Represented by Shook, Hardy & Bacon

Karen Camechis (+)
Pennington Law Firm
215 South Monroe Street
2nd Floor
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Represents Time Warner
karen@penningtonlawfirm.com

Rhythms Links, Inc.
6933 South Revere Parkway
Suite 100
Englewood, CO 80112
Tel. No. (303) 476-4200
Represented by Hopping Law Firm

Benjamin Fincher
Sprint/Sprint-Metro
3100 Cumberland Circle
#802
Atlanta, GA 30339
Tel. No. (404) 649-5144
Fax. No. (404) 649-5174
Represented by Ervin Law Firm

Carolyn Marek
Time Warner
Regulatory Affairs, SE Region
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
carolyn.marek@twtelecom.com
Represented by Pennington Law Firm
Represented by Parker Poe Adams

James Falvey
ACSI
131 National Business Parkway
Annapolis Junction, MD 20701
Represented by Messer Law Firm

Matthew Feil (+)
Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
mfeil@floridadigital.net

Michael Sloan (+)
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007-5116
Tel. No. (202) 295-8458
Fax No. (202) 424-7645
Represents FDN
mcsloan@swidlaw.com

Katz, Kutter Law Firm (+)
Charles J. Pellegrini/Patrick Wiggins
106 E. College Avenue
Tallahassee, FL 32301
Tel. No. 850-224-9634
Fax. No. 850-224-9634
pkwiggins@katzlaw.com

Lori Reese
Vice President of Governmental Affairs
NewSouth Communications
Two Main Street
Greenville, South Carolina 29609
Tel. No. (864) 672-5177
Fax. No. (864) 672-5040
lreese@newsouth.com

Genevieve Morelli
Andrew M. Klein
Kelley Drye & Warren LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036
Represents KMC
aklein@kelleydrye.com

John D. McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrenceville, Georgia 30043
jmclau@kmctelecom.com

Suzanne F. Summerlin, Esq.
1311-B Paul Russell Road
Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax. No. (850) 656-5589
Represents IDS Telecom
summerlin@nettally.com

Henry C. Campen, Jr. (+)
Parker, Poe, Adams & Bernstein, LLP
P.O. Box 389
First Union Capital Center
150 Fayetteville Street Mall
Suite 1400
Raleigh, NC 27602-0389
Tel. No. (919) 890-4145
Fax. No. (919) 834-4564
Represents US LEC of Florida
Represents NuVox Comm.
Represents XO
Represents Time Warner
henrycampen@parkerpoe.com


Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, Georgia 30328-3495
Tel. No. (678) 222-3466
Fax. No. (678) 320-0004
cboone@covad.com

Bruce Culpepper, Esq.
Akerman, Senteriff & Eidson
301 South Bronough Street
Suite 200
Post Office Box 10555
Tallahassee, FL 32302-2555
Attys. for AT&T
Tel. No. (850) 222-3471
Fax. No. (850) 222-8628

Mark D. Baxter
Stone & Baxter, LLP
557 Mulberry Street
Suite 1111
Macon, Georgia 31201-8256
Represents ACCESS
mbaxter@stoneandbaxter.com

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville, Tennessee 37201-2315
Tel. (615) 777-7700
Fax. (615) 345-1564
dana.shaffer@xo.com
Represented by Parker Poe Adams

Peggy Rubino
Z-Tel Communications, Inc.
601 South Harbor Island Boulevard
Suite 220
Tampa, Florida 33602
Tel. No. (813) 233-4611
Fax. No. (813) 233-4620


Nancy B. White (CA)

(+) 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 30, 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 October 9, 2001, BellSouth Telecommunications, Inc. filed its Supplemental Response to Florida Digital Network's ("FDN") First Request for Production of Documents, Item No. 1. The Response contains confidential 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 Supplemental Response to FDN's First Request for Production of Documents Item No. 1 which contains customer-specific information and confidential 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.

4. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

5. Attachment B to BellSouth's Request for Confidential Classification contains two copies of the documents with the confidential information redacted.


6. Attachment C to BellSouth's Request for Confidential Classification is a sealed envelope containing one highlighted copy of the documents including those portions that are confidential and proprietary.

7. 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.

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 30th day of October, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (LA)
JAMES MEZA III
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301
(305) 347-5558

Lisa S Foshee

LISA S. FOSHEE (CA)
FRED J. MCCALLUM
675 W. Peachtree Street
Suite 4300
Atlanta, Georgia 30375
(404) 335-0754

418266

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 960786-A-TL
Request for Confidential Classification
Page 1 of 2
10/30/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO FLORIDA DIGITAL NETWORK'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 1 FILED OCTOBER 9, 2001 IN FLORIDA DOCKET NO. 960786-A-TL

Explanation of Proprietary Information

1. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically this information discusses, describes and evaluates market size, trends, results and weekly tracking, as well as financial impact and strategies. This information, if released, would allow BellSouth's competitors to have free access to certain intellectual property which was developed at significant expense to BellSouth. BellSouth's competitors can use this information to develop their own strategies without the burden and expense of developing this property for themselves. In addition, this document contains customer specific information which the Commission has always zealously protected. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and the information is entitled to confidential classification pursuant to Section 364.183, Florida Statutes. In addition, this information, is valuable because it is used by BellSouth in conducting its business. Therefore, this information should be classified as proprietary, confidential business information exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 960786-A-TL
Request for Confidential Classification
Page 2 of 2
10/30/01**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO FLORIDA DIGITAL NETWORK'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO. 1 FILED OCTOBER 9, 2001 IN FLORIDA DOCKET NO. 960786-A-TL

POD NO. 1

<u>Location</u>	<u>Reason</u>
Entire Response	1