

ORIGINAL

Legal Department

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May 15, 2002

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02 MAY 15 PM 4:44
COMMISSION
CLERK

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. 020119-TP**
Petition of Florida Digital Network, Inc. for Expedited Review and
Cancellation of BellSouth Telecommunications, Inc.'s Key Customer
Promotional Tariffs and For an Investigation of BellSouth
Telecommunications, Inc.'s Promotional Pricing and Marketing Practices

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Response to Staff's Third Set of Interrogatories, Item 14, 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,

Patrick W. Turner

Patrick W. Turner (KA)

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

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

This confidentiality request was filed by or for a "telco" for DN ~~05250-02~~. 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.

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 020119-TP**

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

Electronic Mail and Federal Express this 15th day of May, 2002 to the following:

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Patrick W. Turner
Patrick W. Turner (KA)

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for expedited review and)
Cancellation of BellSouth Telecommunications,))
Inc.'s Key Customer promotional tariffs and for)
Investigation of BellSouth's promotional pricing)
and marketing practices, by Florida Digital)
Network, Inc.)
_____)

Docket No. 020119-TP

Filed: May 15, 2002

**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 April 24, 2002, BellSouth Telecommunications, Inc. filed its Responses to the Staff of the Florida Public Service Commission's ("Staff's") Third Set of Interrogatories. BellSouth's responses to Staff's Third Set of Interrogatories No. 14 contains confidential business information. A Notice of Intent to Request Specified Confidential Classification was filed on that same day for the proprietary information.

2. BellSouth is now filing a Request for Confidential Classification for the subject information because BellSouth's responses to Staff's Third Set of Interrogatories No. 14 contains BellSouth's confidential and proprietary business information. This information includes, among other things, cost information, information regarding the manner in which BellSouth typically configures various business services, and other confidential business information. Pursuant to

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Section 364.183, Florida Statutes, such information is considered proprietary confidential business information.

3. A more specific description of this information is contained in Attachment A. This information is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Sections 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

4. 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.

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

6. 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 requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 15th day of May, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

JAMES MEZA III

c/o Nancy Sims

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
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5/15/02**

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S THIRD SET OF INTERROGATORIES, ITEM NO. 14 FILED MAY 15, 2002, IN FLORIDA DOCKET NO. 020119-TP

Explanation of Proprietary Information

1. This information reflects BellSouth's costs to provide certain services and includes trade secrets, information concerning bids or other contractual data, as well as information relating to BellSouth's competitive interests. This information also reflects information regarding the manner in which BellSouth typically configures various business services, and other confidential business information. The public disclosure of this information would provide BellSouth's competitors with a competitive advantage in that they would know BellSouth's costs in providing certain services. Furthermore, the disclosure of this information would impair BellSouth's ability to contract for goods and services because its competitors will know BellSouth's pricing and cost information and any respective analysis. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO
STAFF'S THIRD SET OF INTERROGATORIES, ITEM NO. 14
FILED MAY 15, 2002, IN FLORIDA DOCKET NO. 020119-TP**

<u>Location</u>	<u>Reason</u>
<u>Interrogatory, Item No. 14</u>	
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Page 3, Lines 31-32, Columns A-G	1
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Page 3, Line 34, Columns F-H	1
Page 4, Lines 1-2, Columns A-C, E and G	1
Page 4, Line 3, Columns E, G and H	1
Page 5, Line 7, Columns G, I, and K	1
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Page 5, Lines 12-13, Columns A-G, I and K	1
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Page 5, Lines 25-30, Columns A-G, I and K	1
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Page 6, Lines 1-5, Columns A-G	1
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