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ORIGINAL

October 25, 2002

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**

Docket No.: 020578-TP
**Petition for Expedited Review and Cancellation of BellSouth
Telecommunications, Inc.'s Key Customer Promotional Tariffs**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses to Florida Digital Network's First Interrogatories, Nos. 4, 14, 15, 18, 19 and 20 and First Request for Production, Nos. 1 and 4, which we ask that you file in the captioned dockets.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me. Copies have been served to the parties shown on the attached certificate of service.

Sincerely,

Patrick W. Turner
Patrick W. Turner
(CA)

Enclosures

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 11738-02. 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.
lx-ref. 10775-02

DOCUMENT NUMBER-DATE

11737 OCT 25 02

FPSC-COMMISSION CLERK

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**CERTIFICATE OF SERVICE
DOCKET NO. 020119-TP and 020578-TP**

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

Electronic Mail and U. S. Mail this 25th day of October 2002 to the following:

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Patrick Turner

(+) Signed Protective Agreement

000721

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Expedited Review and)	Docket Nos.: 020119-TP
Cancellation of BellSouth Telecommunications,)	
Inc.'s Key Customer Promotional Tariffs and)	020578-TP
For an Investigation of BellSouth's)	
Promotional Pricing and Marketing Practices by))	
Florida Digital Network, Inc.)	
_____)	
In re: Petition for expedited review and)	
Cancellation of BellSouth Telecommunications,)	
Inc.'s Key Customer Promotional Tariffs by)	
Florida Competitive Carriers Association)	
_____)	Filed: October 25, 2002

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

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

1. On October 4, 2002, BellSouth Telecommunications, Inc. filed it's Responses to FDN's 1st Set of Interrogatories and 1st Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Response to Staff's 1st Interrogatories, Nos. 4,14,15,18,19 and 20 and 1st Request for Production, Nos. 1 and 4.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for BellSouth's Response to FDN's 1st Interrogatories, Nos. 4,14,15,18,19 and 20 and 1st Request for Production, Nos. 1 and 4 because said documents contain competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

DOCUMENT NUMBER-DATE
11737 OCT 25 02
000722
FPSC-COMMISSION CLERK

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 are 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 25th day of October, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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000723

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
Page 1 of 4
10/25/02

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO FDN'S 1ST SET OF INTERROGATORIES (ITEM NOS. 4,14,15,18,19AND 20) AND
1ST REQUEST FOR PRODUCTION (NOS. 1 AND 4) FILED OCTOBER 4, 2002, IN
FLORIDA DOCKET NO. 020119-TP**

Explanation of Proprietary Information

1. This information contains competitive business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, *such information is a trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act.*

000724

BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
Page 2 of 4
10/25/02

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
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Interrogatory No. 4

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

Interrogatory No. 14

<u>Location</u>	<u>Reason</u>
Columns A, B, C and D	1

Interrogatory No. 15

<u>Location</u>	<u>Reason</u>
CLAC Column	1
Lines Column	1

Interrogatory No. 18

<u>Location</u>	<u>Reason</u>
Pgs 1-8, Jan through Dec Columns	1
Pgs 9-12, Jan through Jul Columns	1
2000 Total Column	
2001 Total Column	
2002 YTD Column	

BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
Page 3 of 4
10/25/02

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
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Interrogatory No. 19

<u>Location</u>	<u>Reason</u>
Pgs 1-8, Jan through Dec Columns	1
Pgs 9-12, Jan through Jul Columns	1
2000 Total Column	
2001 Total Column	
2002 YTD Column	

Interrogatory No. 20

<u>Location</u>	<u>Reason</u>
Pg 1, Lines 1 and 2	1

POD No. 1

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

POD No. 4

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

BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP
Request for Confidential Classification
Page 4 of 4
10/25/02

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POD No. 4

<u>Location</u>	<u>Reason</u>
Pages 2-23, Entire page	1
Pages 25-40, Entire page	1
Pages 43-63, Entire page	1
Page 75, Entire page	1
Page 77, Entire page	1
Page 79, Entire page	1
Page 80, Entire page	1
Page 83, Entire page	1
Page 85, Entire page	1
Page 98, Entire page	1
Page 100, Entire page	1
Page 102, Entire page	1
Page 104, Entire page	1
Page 106, Entire page	1
Page 108, Entire page	1