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ORIGINAL

November 5, 2002

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COMMISSION  
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Mrs. Blanca S. Bayó  
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 responses filed to Florida Public Service Commission Staff's Fifth Set of Interrogatories No. 30 (Attachment), 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.

This confidentiality request was filed by or for a "telco" for DN 12168-02. 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.

(x-ref. 11220-02)

Sincerely,  
*Patrick W. Turner*  
Patrick W. Turner (KA)

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

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*RAM*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12168 NOV-5 2002 00751

FPSC-COMMISSION CLERK

**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 (\*)  
Hand Delivery, Electronic Mail, and U.S. Mail this 5th day of November 2002 to the following:

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Linda Dodson (\*)  
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Patrick Turner  
Patrick Turner (KA)

**(+) Signed Protective Agreement**

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 an Investigation of BellSouth's Promotional Pricing and Marketing Practices by Florida Digital Network, Inc.

Docket Nos.: 020119-TP 020578-TP

In re: Petition for expedited review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs by Florida Competitive Carriers Association

Filed: November 5, 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 15, 2002, BellSouth Telecommunications, Inc. filed it's Responses to Staff's 5th Set of Interrogatories and 4th Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Response to Staff's 5th Interrogatories, Item No. 30 (Attachment).

2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for BellSouth's Response to Staff's 5th Interrogatories, No. 30 (Attachment) because said document contain competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

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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 5th day of November 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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JAMES MEZA III  
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000755

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020119-TP/020578-TP  
Request for Confidential Classification  
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### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S 5<sup>TH</sup> SET OF INTERROGATORIES (ITEM NO. 30) FILED OCTOBER 15, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-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.

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020119-TP/020578-TP  
Request for Confidential Classification  
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11/5/02**

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2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP**

**Interrogatory No. 30**

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