

PATRICK W. TURNER
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0761

ORIGINAL

November 19, 2002

RECEIVED-FPSC
02 NOV 19 PM 4:51
COMMISSION
CLERK

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 its responses to the Florida Public Service Commission Staff's Third Set of Interrogatories No. 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.

This confidentiality request was filed by or for a "telco" for DN 12683-02. 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. 11870-02)

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

RECEIVED & FILED

RAM

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12682 NOV 19 02

000802

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 Electronic Mail and U.S. Mail this 19th day of November 2002 to the following:

Felicia Banks
Linda Dodson
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6216
fbanks@psc.state.fl.us
ldodson@psc.state.fl.us

Matthew Feil (+)
Florida Digital Network
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net


Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Marsha Rule
Rutledge, Ecenia, Purnell & Hoffman
215 S. Monroe St., Suite 420 (32301)
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Atty. for US LEC
Ken@Reuphlaw.com

Dana Shaffer
105 Molly Street, Suite 300
Nashville, TN 37201
Tel. No. (615) 777-7700
Fax. No. (615) 345-1564
Atty. for XO
dana.shaffer@xo.com

Karen Camechis, Esq.
Pennington Law Firm
P.O. Box 10095
215 South Monroe Street
Tallahassee, FL 32302-2095
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Atty. for Time Warner
Karen@penningtonlawfirm.com

Carolyn Marek
Time Warner
233 Bramerton Court
Franklin, TN 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Carolyn.Marek@twtelecom.com

Joseph A. McGlothlin (+)
Vicki Gordon Kaufman
Timothy J. Perry
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold
& Steen, PA
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
jmcglothlin@mac-law.com
vkaufman@mac-law.com
Attys. for FCCA


Patrick W. Turner (KA)

(+) Signed Protective Agreement

000804

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

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

020578-TP

Filed: November 19, 2002

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On October 29, 2002, BellSouth Telecommunications, Inc. (hereinafter "BellSouth") filed its revised response to Staff's 3rd Set of Interrogatories, Item No. 14. The attachment to this response contains confidential customer information and competitive business information. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification for BellSouth's revised response to Staff's 3rd Set of Interrogatories, Item No. 14, because the information contained in the attachment includes confidential customer information and competitive business information that could cause competitive harm to BellSouth and violate Florida law if disclosed.

DOCUMENT NUMBER-DATE

12682 NOV 19 02

FPSC-COMMISSION CLERK 000805

3. 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.

4. Attachment B to BellSouth's Request for Confidential Classification is a redacted copy of the confidential information.

5. Attachment C to BellSouth's Request for Confidential Classification is a proprietary copy of the confidential information.

6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth strives to keep it secret, and this information has not been generally disclosed.

7. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the Parties.

WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Chapter 364, Florida Statutes, 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 19th day of November 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

(WA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey

R. DOUGLAS LACKEY

(VA)

PATRICK W. TURNER

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0761

000807

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP/020578-TP
Request for Confidential Classification
Page 1 of 3
11/19/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S REVISED
RESPONSE TO STAFF'S 3RD SET OF INTERROGATORIES, ITEM NO. 14 FILED
OCTOBER 29, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP**

Explanation of Proprietary Information

1. This information contains confidential customer information and competitive business information, including customer location. 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.

000808

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020119-TP/020578-TP
Request for Confidential Classification
Page 1 of 3
11/19/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED
RESPONSE TO STAFF'S 3RD SET OF INTERROGATORIES, ITEM NO. 14 FILED
OCTOBER 29, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP**

Interrogatory No. 14

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