Legal Department

PATRICK W. TURNER
Senior Regulatory Counsel

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

ORIGINAL

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November 20, 2002

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 Florida Digital Network, Inc.'s First Set of Interrogatories No. 23, 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.

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OTH

This confidentiality request was filed by or for a "telco" for DN 12766-02. 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. 11908-02)

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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DOCUMENT NUMBER-DATE
12765 NOV 20 02
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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 20th 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
Rutldege, 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 (PA)
Patrick W. Turner

(+) 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
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 20, 2002

ORIGINAL

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 30, 2002, BellSouth Telecommunications, Inc. (hereinafter "BellSouth") filed its Supplemental Response to Florida Digital Network, Inc. First Set of Interrogatories, Item No. 23. The information contained in BellSouth's response is confidential business information that is proprietary to BellSouth. 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 Supplemental response to Florida Digital Network, Inc. First Set of Interrogatories, Item No. 23, because the information contained in BellSouth's response is confidential business information that is proprietary to BellSouth and the release of such information could cause competitive harm to BellSouth and violate Florida law if disclosed.

DOCUMENT NUMBER-DATE
12765 NOV 20 02
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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 20th day of November, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

Patrick W. Turner (KA)
R. DOUGLAS LACKEY
PATRICK W. TURNER
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0761

ATTACHMENT A

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO FLORIDA DIGITAL NETWORK, INC.'S FIRST SET OF INTERROGATORIES, ITEM NO. 23 FILED OCTOBER 30, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP

Explanation of Proprietary Information

1.

This information reflects BellSouth's market strategy relating to it's competitive marketing position. Specifically, this information describes and evaluates BellSouth's potential strategic responses to various competitive scenarios BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.

ATTACHMENT A

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

11/20/02

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SUPPLEMENTAL RESPONSE TO FLORIDA DIGITAL NETWORK, INC.'S FIRST SET OF INTERROGATORIES, ITEM NO. 23 FILED OCTOBER 30, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP

Interrogatory No. 23

Location	Reason
Line 3	1
Line 6	1