

ORIGINAL

Legal Department

JAMES MEZA III
Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

November 21, 2002

RECEIVED FPSC
02 NOV 21 PM 4:16
COMMISSION
CLERK

Mrs. Blanca S. Bayó
Director, Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 001503-TP (Number Pooling Trials)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Revised Response to Citizen's First Request for Production, Item No. 1, which contains BellSouth's revised cost study.

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,

James Meza III
James Meza III (CA)

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

This confidentiality request was filed by or for a "telco" for DN 12832-02. 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. 11949-02) for #1 only

RECEIVED & FILED

Man
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12831 NOV 21 02

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 001503-TP

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

U.S. Mail this 21st day of November, 2002 to the following:

Patricia Christensen
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Office of Public Counsel
Charles Beck (*)
c/o The Florida Legislature
111 West Madison Street
#812
Tallahassee, FL 32399-1400
Tel. No. (850) 488-9330
Fax. No. (850) 488-4491
beck.charles@leg.state.fl.us

Kenneth Hoffman/John Ellis
Rutledge, Ecenia, Purnell & Hoffman
215 South Monroe Street
Suite 420
Tallahassee, FL 32301
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Atty. for VoiceStream Wireless
Atty. for Verizon Wireless

Time Warner Telecom of Florida, L.P.
c/o Carolyn Marek
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405

Peter M. Dunbar, Esq.
Karen M. Camechis, Esq.
Pennington, Moore, Wilkinson,
Bell & Dunbar, P.A.
P.O. Box 10095 (32302)
215 South Monroe Street, 2nd Flr.
Tallahassee, FL 32301
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
Counsel for Time Warner
Pete@penningtonlawfirm.com
Karen@penningtonlawfirm.com

Susan Masterton
Sprint-Florida Incorporated
Sprint Communications Company LP
P.O. Box 2214
Tallahassee, FL 32316-2214
Tel. No. (850) 599-1560

Jeff Pfaff
Sprint PCS
Legal Department
6160 Sprint Parkway, 4th Floor
Overland Park, KS 66251
Tel. No. (913) 762-7737

Anne E. Hoskins
Regulatory Counsel
Verizon Wireless
1300 "Eye" Street, N.W.
Suite 400W
Washington, D.C. 20005

Kimberly Caswell
Verizon Florida, Inc.
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110
Tel. No. (813) 483-2617

Florida Cable Telecomm. Assoc.
Michael A. Gross
V.P., Regulatory Affairs &
Regulatory Counsel
246 East 6th Avenue
Tallahassee, FL 32303
Tel No. (850) 681-1990
Fax No. (850) 681-9676

Floyd R. Self
Messer, Caparello & Self, P.A.
215 South Monroe Street
Suite 701
Tallahassee, FL 32301-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
fself@lawfla.com
Represents AT&T and WorldCom

Donna Canzano McNulty
WorldCom, Inc.
The Atrium, Suite 105
325 John Knox Road
Tallahassee, Florida 32303
Tel. No. (850) 422-1254
Fax. No. (850) 422-2586
donna.mcnulty@wcom.com

Claudia Davant
AT&T Communications of the
Southern States, Inc.
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
cdavant@att.com

Bettye Willis
ALLTEL Corporate Services, Inc.
One Allied Drive
Little Rock, AR 72203-2177

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
Tel. No. (850) 425-5471
jwahlen@ausley.com


James Meza III (KA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Cost Recovery and)
Allocation of Issues for Number)
Pooling Trials in Florida)
_____)

Docket No. 001503-TP

Filed: November 21, 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 31, 2002, BellSouth filed its Revised response to Citizens' First Request for Production, Item No. 1 which contains BellSouth's revised cost study. The cost study is considered 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 because the information contained in BellSouth's cost study includes vendor-specific pricing information and other confidential business information that could cause competitive harm to BellSouth.

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 CD Rom that contains the public version of the cost study.

5. Attachment C to BellSouth's Request for Confidential Classification is a CD Rom that contains the proprietary version of the cost study.

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.

0

Respectfully submitted this 21st day of November 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.



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



R. DOUGLAS LACKEY (LA)
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0761

**BellSouth Telecommunications, Inc.
FPSC Docket No. 001503-TP
Request for Confidential Classification
Page 1 of 2
11/21/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED
RESPONSE TO CITIZENS' FIRST REQUEST FOR PRODUCTION, ITEM NO. 1
FILED ON OCTOBER 31, 2002 IN FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 001503-TP**

Explanation of Proprietary Information

- A. The information contained in Exhibit "A" to BellSouth's Petition for Cost Recovery is a cost study that includes vendor-specific pricing information, confidential business information and customer proprietary information that is considered proprietary to BellSouth. Disclosure of this information would cause competitive harm to BellSouth. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.



ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 001503-TP
Request for Confidential Classification
Page 2 of 2
11/21/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S REVISED
RESPONSE TO CITIZENS' FIRST REQUEST FOR PRODUCTION, ITEM NO. 1
FILED ON OCTOBER 31, 2002 IN FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 001503-TP**

LOCATION

Entire Proprietary CD Rom

BASIS FOR REQUEST

1