

Meredith E. Mays  
Regulatory Counsel

BellSouth Telecommunications, Inc.  
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December 17, 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. 020507-TL (FCCA Complaint)**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses to FCCA's Second Set of Interrogatories (Item Nos. 3 through 6), 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.

Sincerely,

  
Meredith E. Mays (KA)

Enclosure

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

473717

DOCUMENT NUMBER - DATE  
13754 DEC 17 02  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 020507-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and U.S. Mail this 17<sup>th</sup> day of December 2002 to the following:

Patricia Christensen  
Staff Counsel  
Florida Public Service  
Commission  
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Meredith E. Mays (ICA)

(+) Signed Protective Agreement

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida Competitive Carriers Association Against BellSouth Telecommunications, Inc. And Request for Expedited Relief )  
 )  
 ) Docket No. 020507-TL  
 )  
 )  
 ) Filed: December 17, 2002

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**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 November 26, 2002, BellSouth Telecommunications, Inc. filed it's Responses to Florida Competitive Carriers Association's (FCCA's) 2<sup>nd</sup> Set of Interrogatories. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Response to FCCA's 2<sup>nd</sup> Set of Interrogatories, Item Nos. 3-6. BellSouth hereby withdraws from intent it's response to FCCA's 2<sup>nd</sup> Set of Interrogatories, Item No. 6.

Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for BellSouth's Response to FCCA's 2<sup>nd</sup> Set of Interrogatories, Item Nos. 3-5 because said responses contain competitive business information, in particular, customer specific information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

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.

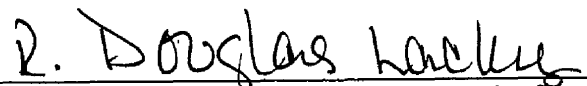
5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

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 17th day of December, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
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\_\_\_\_\_  
R. DOUGLAS LACKEY (KA)  
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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020507-TL  
Request for Confidential Classification  
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### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES, ITEM NOS. 3-5 FILED NOVEMBER 26, 2002, IN FLORIDA DOCKET NO. 020507-TL**

#### **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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
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12/17/02**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES, ITEM NOS. 3-5 FILED NOVEMBER  
26, 2002, IN FLORIDA DOCKET NO. 020507-TL**

**INTERROGATORY NO. 3**

<u>Location</u>	<u>Reason</u>
Total Ports Provisioned Column	1

**INTERROGATORY NO. 4**

<u>Location</u>	<u>Reason</u>
Total Ports Provisioned Column	1

**INTERROGATORY NO. 5**

<u>Location</u>	<u>Reason</u>
Line 6	1