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ORIGINAL

December 23, 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

RECEIVED-FPSC  
02 DEC 23 PM 4:43  
COMMISSION  
CLERK

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 the attachment to items 49 and 50 of its Response to the Florida Public Service Commission Staff's 7<sup>th</sup> Set of Interrogatories (Nos. 47-50), 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*  
Meredith E. Mays (KA)

This confidentiality request was filed by or for a "telco" for DN 13992-02. 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. 13259-02)*

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

*Request*  
DOCUMENT NUMBER-DATE  
**13991 DEC 23 8**

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**13993 DEC 23 8**  
*Confidential*  
DOCUMENT NUMBER-DATE  
**13992 DEC 23 8**  
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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 23<sup>rd</sup> day of December 2002 to the following:

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Attys. for FCCA

  
Meredith E. Mays (KA)

**(+) Signed Protective Agreement**

**001163**

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: December 23, 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 December 4, 2002, BellSouth Telecommunications, Inc. (hereinafter "BellSouth") filed its response to the Florida Public Service Commission Staff's 7<sup>th</sup> Set of Interrogatories, (Nos. 47-50). The attachment to Interrogatory No. 49 contains end-user specific account information. Additionally, the attachment to Interrogatory No. 50 contains cost information and vendor-specific pricing information, which is considered proprietary to BellSouth. BellSouth filed a Notice of Intent to Request Specified Confidential Classification of the Interrogatory attachments on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification for the attachments to Interrogatory Nos. 49 and 50, because the information contained in these exhibits include end-user specific account information, cost information and vendor-specific pricing information that could cause competitive harm to BellSouth and violate Florida law if disclosed.

DOCUMENT NUMBER-DATE

13991 DEC 23 001164

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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 23<sup>rd</sup> day of December, 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (CA)

JAMES MEZA III

c/o Nancy Sims

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*R. Douglas Lackey*

R. DOUGLAS LACKEY (CA)

MEREDITH E. MAYS

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Atlanta, GA 30375

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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 020119-TP/020578-TP  
Request for Confidential Classification  
Page 1 of 2  
12/23/02**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S 7<sup>TH</sup> SET OF INTERROGATORIES, ITEM NOS. 49 AND 50 FILED DECEMBER 4, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP**

#### **Explanation of Proprietary Information**

1. This information reflects end-user specific account information. BellSouth is prohibited from disclosing these records pursuant to 364.24, Florida Statutes. Therefore, the subject information should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.
2. This information reflects BellSouth's cost to provide certain services. It would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. Further, public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. Accordingly, the subject information should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes.

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## ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 020119-TP/020578-TP  
Request for Confidential Classification  
Page 2 of 2  
12/23/02

### REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO STAFF'S 7<sup>TH</sup> SET OF INTERROGATORIES, ITEM NOS. 49 AND 50 FILED DECEMBER 4, 2002, IN FLORIDA DOCKET NOS. 020119-TP AND 020578-TP

#### INTERROGATORY NO. 49

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

#### INTERROGATORY NO. 50

<u>Location</u>	<u>Reason</u>
Columns A-G	2

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