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ORIGINAL

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February 13, 2003

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COMMISSION CLERK

Ms. 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. 021252-TP**

**In re: Petition for expedited review and cancellation or suspension of BellSouth Telecommunications, Inc.'s Key Customer tariff filed 12/16/02, by Florida Digital Network, Inc.**

: **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 attachment to its response to FDN's Second Set of Interrogatories (No. 47) which we ask that you file in the captioned dockets.

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 01516-03. 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.

Sincerely,

*Meredith E. Mays*  
Meredith E. Mays (KA)

Enclosure (x-ref. 01221-03)

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 021252-TP; 020119-TP and 020578-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and FedEx the 13<sup>th</sup> day of February 2003 to the following:

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Linda Dodson  
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Represents ITC^DeltaCom

  
Meredith E. Mays (KA)

**(+) Signed Protective Agreement**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Expedited Review and Cancellation or Suspension of BellSouth Telecommunications, Inc.'s Key Customer Tariff filed 12/16/02, by Florida Digital Network, Inc.

Docket No. 021252-TP

In Re: 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 020119-TP

In Re: Petition for Expedited Review and Cancellation of BellSouth Telecommunications, Inc.'s Key Customer Promotional Tariffs

Docket 020578-TP

Filed February 13, 2003

**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 February 5, 2003, BellSouth Telecommunications, Inc. filed its Responses to the Florida Digital Network's Second Set of Interrogatories (2-9). In addition, BellSouth filed a Notice of Intent with respect to Interrogatory No. 47. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification of the attachment provided in response to Interrogatory No. 47 of the Florida Digital Network's Second Set of Interrogatories because said document contains competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

DOCUMENT NUMBER DATE  
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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.

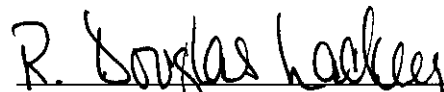
5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

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 13<sup>th</sup> day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
\_\_\_\_\_  
NANCY B. WHITE (C/A)  
JAMES MEZA III  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

  
\_\_\_\_\_  
R. DOUGLAS LACKEY (C/A)  
Meredith E. Mays  
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Atlanta, Georgia 30375  
(404) 335-0750

## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 021252/020119/202578-TP  
Request for Confidential Classification  
Page 1 of 2  
2/13/03**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO FDN'S 2<sup>ND</sup> SET OF INTERROGATORIES, ITEM NO. 47 FILED FEBRUARY 5, 2003, IN FLORIDA DOCKET NOS. 021252/020119/202578-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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 021252/020119/202578-TP  
Request for Confidential Classification  
Page 2 of 2  
2/13/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FDN'S 2<sup>ND</sup> SET OF INTERROGATORIES, ITEM NO. 47 FILED FEBRUARY 5,  
2003, IN FLORIDA DOCKET NOS. 021252/020119/202578-TP**

**Interrogatory No. 47**

<u>Location</u>	<u>Reason</u>
CLACs Column	1
Lines Column	1