

ORIGINAL

Legal Department

J. Phillip Carver
Senior Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0710

February 25, 2003

RECEIVED-FPSC
03 FEB 25 PM 4:32
COMMISSION
CLERK

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification, 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,

J. Phillip Carver

J. Phillip Carver (KA)

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

This confidentiality request was filed by or for a "telco" for DN 01947-03. 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.

*X-ref 01156-03
See 01157-03*

RECEIVED & FILED

R-VN
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

01946 FEB 25 03

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 981834-TP and 990321-TP

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

First Class U.S. Mail this 25th day of February, 2003 to the following:

Beth Keating, Staff Counsel
C. Lee Fordham, Staff Counsel
Wayne Knight, Staff Counsel
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6212
Fax. No. (850) 413-6250
bkeating@psc.state.fl.us
cfordham@psc.state.fl.us
wknight@psc.state.fl.us

Joseph A. McGlothlin
Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman, Arnold,
& Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
Attys. for FCCA
Atty. for Network Telephone Corp.
Atty. for BlueStar
jmcglothlin@mac-law.com
vkaufman@mac-law.com

Richard D. Melson
Hopping Green Sams & Smith, P.A.
Post Office 6526
123 South Calhoun Street
Tallahassee, FL 32314
Tel. No. (850) 222-7500
Fax. No. (850) 224-8551
Atty. For MCI & ACI
rmelson@hgslaw.com
Terry Monroe

Vice President, State Affairs
Competitive Telecomm. Assoc.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
Tel. No. (202) 296-6650
Fax. No. (202) 296-7585
tmonroe@comptel.org

Marilyn H. Ash
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, Nevada 89129
Tel. No. (702) 310-8461
Fax. No. (702) 310-5689

Patrick Wiggins
Charles J. Pellegrini
Katz, Kutter Law Firm
106 E. College Avenue
12th Floor
Tallahassee, FL 32301
Tel. No. (850) 224-9634
Fax. No. (850) 222-0103
Attys. for Intermedia
pkwiggins@katzlaw.com

Kimberly Caswell
Richard A. Chapkis
Verizon Florida, Inc.
One Tampa City Center
201 North Franklin Street (33602)
Post Office Box 110, FLTC0007
Tampa, Florida 33601-0110
Tel. No. (813) 483-2606
Fax. No. (813) 204-8870
kimberly.caswell@verizon.com

Peter M. Dunbar, Esq.
Barbara D. Auger, Esq.
Pennington, Moore, Wilkinson &
Dunbar, P.A.
Post Office Box 10095
Tallahassee, Florida 32302
Tel. No. (850) 222-3533
Fax. No. (850) 222-2126
pete@penningtonlawfirm.com
Barbara@penningtonlawfirm.com

Carolyn Marek
Vice President of Regulatory Affairs
Southeast Region
Time Warner Communications
233 Bramerton Court
Franklin, Tennessee 37069
Tel. No. (615) 376-6404
Fax. No. (615) 376-6405
Represented by Pennington Law Firm
Carolyn.Marek@twtelecom.com

Mark Buechele
Supra Telecommunications &
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, FL 33133
Tel. No. (305) 531-5286
Fax. No. (305) 476-4282
buechele@stis.net

Donna Canzano McNulty, Esq.
MCI WorldCom
1203 Governors Square Boulevard
Suite 201
Tallahassee, FL 32301
Tel. No. (850) 219-1008
Fax. No. (850) 219-1018
Donna.mcnulty@wcom.com

Michael A. Gross
VP Reg. Affairs & Reg. Counsel
Florida Cable Telecomm. Assoc.
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990

Fax. No. (850) 681-9676
mgross@fcta.com

TCG South Florida
c/o Rutledge Law Firm
Kenneth Hoffman
P.O. Box 551
Tallahassee, FL 32302-0551
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
ken@reuphlaw.com

Time Warner AxS of FL, L.P.
2301 Lucien Way
Suite 300
Maitland, FL 32751
Represented by Pennington Law Firm

Laura L. Gallagher
Laura L. Gallagher, P.A.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301
Tel. No. (850) 224-2211
Fax. No. (850) 561-3611
Represents MediaOne

Susan S. Masterton (+)
Charles J. Rehwinkel
Sprint Comm. Co. LLP
P.O. Box 2214
MC: FLTLHO0107
Tallahassee, FL 32316-2214
Tel. No. (850) 847-0244
Fax. No. (850) 878-0777
Susan.masterton@mail.sprint.com

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
P.O. Box 2214 (MC FLTLHO0107)
Tallahassee, FL 32316-2214
Tel: 850-599-1027
Fax: 407-814-5700
Ben.Poag@mail.sprint.com

William H. Weber, Senior Counsel
Gene Watkins
Covad Communications
1230 Peachtree Street, N.E.
19th Floor
Atlanta, Georgia 30309
Tel. No. (404) 942-3494
Fax. No. (404) 942-3495
wweber@covad.com
gwatkins@covad.com

Bettye Willis
ALLTEL Comm. Svcs. Inc.
One Allied Drive
Little Rock, AR 72203-2177
bettye.j.willis@alltel.com

J. Jeffry Wahlen
Ausley & McMullen
P.O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com

Rodney L. Joyce
Shook, Hardy & Bacon, L.L.P.
600 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2004
Tel. No. (202) 639-5602
Fax. No. (202) 783-4211
Counsel for Network Access Solutions
rjoyce@shb.com

Brent McMahan, Vice President
Regulatory and Governmental Affairs
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
Tel. No. (850) 432-4855
Fax. No. (850) 437-0724

Network Access Solutions Corp.
Mr. Don Sussman
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

Tel. No. : (703) 793-5102
Fax. No. (208) 445-7278
dsussman@nas-corp.com

Verizon Florida, Inc.
Ms. Michelle A. Robinson
%Mr. David Christian
106 East College Avenue
Suite 810
Tallahassee, FL 32301-7704
Tel. No. (813) 483-2526
Fax. No. (813) 223-4888
Michelle.Robinson@verizon.com

Ms. Lisa A. Riley
1200 Peachtree Street, N.E.
Suite 8066
Atlanta, GA 30309-3523
Tel. No. (404) 810-7812
Fax. No. (404) 877-7646
lriley@att.com

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801
Tel. No. (407) 835-0460
Fax. No. (407) 835-0309
mfeil@floridadigital.net

FPTA, Inc.
Mr. David Tobin
Tobin & Reyes
7251 West Palmetto Park Road
#205
Boca Raton, FL 33433-3487
Tel. No. (561) 620-0656
Fax. No. (561) 620-0657
dst@tobinreyes.com

John McLaughlin
KMC Telecom. Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043
Tel. No. (678) 985-6261
Fax. No. (678) 985-6213
jmclau@kmctelecom.com

Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343
Tel. No. (256) 382-3856
Fax. No. (256) 382-3936
nedwards@itcdeltacom.com

Telecomm. Resellers Assoc.
Andrew Isar
7901 Skansie Avenue
Suite 240
Gig Harbor, WA 98335
Tel. No. (253) 851-6700
Fax. No. (253) 851-6474

Tracy W. Hatch, Esq. (+)
Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
Post Office Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
Represents AT&T
Represents ITC^DeltaCom
fself@lawfla.com
thatch@lawfla.com

J. Phillip Carver
J. Phillip Carver (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers
for Commission action to support local) Docket No. 981834-TP
competition in BellSouth)
Telecommunications, Inc.'s service)
Territory)

In re: Petition of ACI Corp. d/b/a)
Accelerated Connections, Inc. for) Docket No. 990321-TP
Generic Investigation into Terms and)
Conditions of Physical Collocation)

Filed: February 25, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On February 4, 2003, BellSouth filed the Direct Testimony of W. Bernard Shell, which included, as WBS-1, BellSouth's cost study. The cost study contains 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 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 if publicly disclosed.

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 document containing the confidential information.

5. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all respects, 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 Section 364.183, Florida Statutes, that 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 25th day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (LA)

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

J. Phillip Carver

J. PHILLIP CARVER (LA)

R. DOUGLAS LACKEY
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0710

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 1 of 4
2/25/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT WBS-1 TO THE
DIRECT TESTIMONY OF W. BERNARD SHELL FILED ON FEBRUARY 4, 2003 IN
FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 981834-TP/990321-TP**

Explanation of Proprietary Information

- A. This information reflects vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d) Florida Statutes and is exempt from the Open Records Act.

<u>PAGE NO.</u>	<u>BASIS FOR REQUEST</u>
000011, line 179, Column L	1
000012, lines 180-188, Column L	1
000013, lines 256-258, Column L	1
000014, lines 360-362, Column L	1
000015, lines 420-427, Column L	1
000016, lines 428-429, Column L	1
000018, lines 593-602, Column L	1
000019, lines 629-638, Column L	1
000020, lines 17-18, 34, 39, 41, 46, 51, 53, 61, 63, Column F	1
000021, lines 71, 73, 78, 80, 82, 84, 88, 90, 92, 94, 98, 100, 102, 104, 106, 108, 112, 114, 116, 118, 120, 122, Column F	1
000022, lines 140, 142, 151, 153, 158-159, 161, 165-166 170-171, 175-176, 179-180, 186-187, 189, Column F	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 2 of 4
2/25/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT WBS-1 TO THE
DIRECT TESTIMONY OF W. BERNARD SHELL FILED ON FEBRUARY 4, 2003 IN
FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 981834-TP/990321-TP**

<u>PAGE NO.</u>	<u>BASIS FOR REQUEST</u>
000023, lines 193-194, 198-199, 203-204, 207-208, 214-215, Column F	1
000024, lines 247-248, 252-253, 255, 257, 259, 285-286, Column F	1
000026, lines 10-19, Column C	1
000028, lines 11, 13, Column E	1
000030, lines 11, 23, 27, Column E	1
000032, lines 11, 23, 27, Column E	1
000033, lines 19, 23, Column E	1
000034, lines 19, 23, Column E	1
000035, lines 11, 15, 21, 25, Column E	1
000036, lines 11, 15, 21, 25, Column E	1
000037, lines 11, 15, 21, 25, 31, 35, Column E	1
000038, lines 11, 15, 21, 25, 31, 35, Column E	1
000040, lines 21, 25, Column E	1
000041, lines 21, 25, Column E	1
000042, lines 11, 13, 17, 27, 29, 39, 41, 51, 53, Column E	1
000043, lines 61, 63, Column E	1
000044, lines 11, 13, 17, 27, 29, 39, 41, 51, 53, 61, 63, Column E	1
000046, lines 17, 19, Column E	1
000047, lines 11, 13, 15, Column E	1
000048, line 11, Column E	1
000049, lines 11, 13, 15, Column E	1
000052, lines 9, 11, Column E	1
000053, lines 9, 11, 17, 23, 29, Column E	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 3 of 4
2/25/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT WBS-1 TO THE
DIRECT TESTIMONY OF W. BERNARD SHELL FILED ON FEBRUARY 4, 2003 IN
FLORIDA PUBLIC SERVICE
COMMISSION DOCKET 981834-TP/990321-TP**

Explanation of Proprietary Information

<u>PAGE NO.</u>	<u>BASIS FOR REQUEST</u>
000054, lines 11, 13, 15, Column E	1
000055, lines 11, 13, 15, Column E	1
000056, lines 11, 13, Column E	1
000057, lines 10-19, Column C	1
000059, lines 10-19, Column C	1
000060, lines 10-19, Column C	1
000069, lines 97-106, Column L	1
000072, lines 26-27, 33-34, 38-39, 45-46, 50-51, 60-61, Column F	1
000073, lines 70-71, 81-82, 93-94, Column F	1
000074, lines 10-19, Column C	1
000077, lines 9, 11, Column E	1
000078, lines 11, 13, 23, 25, Column E	1
000080, lines 11, 13, 23, 25, Column E	1
000081, lines 19, 21, Column E	1
000082, lines 19, 21, Column E	1
000083, lines 21, 23, Column E	1
000084, lines 21, 23, Column E	1
000089, lines 12-13, 17-18, 22-23, 27-28, 34-35, 39-40, 44-45, 49-50, Column F	1
000090, lines 61-62m 66-67, 71-72, 75-76, 79-80, Column F	1
000091, lines 11, 13, 23, 25, 35, 37, 47, 49, Column E	1
000093, lines 11, 13, 23, 25, 35, 37, 47, 49, Column E	1
000094, lines 11, 13, 23, 25, 35, 37, 47, 49, 57, 59, Column E	1
000095, lines 69, 71, Column E	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 4 of 4
2/25/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT WBS-1 TO THE DIRECT TESTIMONY OF W. BERNARD SHELL FILED ON FEBRUARY 4, 2003 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 981834-TP/990321-TP

Explanation of Proprietary Information

<u>PAGE NO.</u>	<u>BASIS FOR REQUEST</u>
000104, lines 19, 21, 24, 26, 31, 33, 36, 38, 46, 48, 56, 58, Column F	1
000105, lines 67, 69, 78, 80, Column F	1
000106, lines 10, 14, 22, 26, Column E	1
000108, lines 10, 14, 22, 26, Column E	1
000109, lines 18, 22, Column E	1
000110, lines 18, 22, Column E	1
000111, lines 20, 24, Column E	1
000112, lines 20, 24, Column E	1
000117, lines 11-13, Column L	1
000119, lines 14-15, 21-22, 28-29, Column F	1
000120, lines 9, 11, 26, 28, 43, 45, Column E	1
000121, lines 10, 12, 14, Column E	1

Proprietary CD Rom

Files
Flphycol.xls
Flasmbpt.xls
Fladjphc.xls
Fcollrt.xls
DS1_ds1_calc.xls
MDF_mdf_fund.xls
H.1.37.xls
H.1.42 & H.1.43.xls
H.1.8, H.1.71 and H.2.4.xls
H.6.2.xls