

ORIGINAL

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RECEIVED-FPSC
03 APR 23 PM 4:39
COMMISSION
CLERK

April 23, 2003

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 are 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

AUS _____
CAF _____
CMP _____
COM 5 _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

RECEIVED & FILED

Marguerite P. V. D.
FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN 03147-03. 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. 03121-03)

DOCUMENT NUMBER-DATE

03746 APR 23 8

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 Hand Delivery (#), First Class U.S. Mail, and Electronic Mail this 23rd day of April, 2003 to the following:

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J. Phillip Carver (KA)

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers)	Docket No. 981834-TP
For Commission Action To Support)	
Local 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)	
)	
<hr/>		Filed: April 23, 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 April 2, 2003, BellSouth filed its response to Florida Public Commission Staff's Third Request for Production of Documents. BellSouth's Response to Staff's Third Request for Production of Documents, Request Nos. 15, 17 and 21 contain 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 Response to Staff's Third Request for Production of Documents, Request Nos. 15, 17 and 21 include competitive information, contractual data and other confidential business practices/procedures utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause

competitive harm to BellSouth and provide competitors with an unfair advantage in future negotiations. The information discussed in Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary information pursuant to Section 364.24 and Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

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 redacted copies of the documents 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 requests, 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, 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 23rd day of April, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 1 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

Explanation of Proprietary Information

1. This information is vendor-specific pricing information, including that which is incorporated into cost studies. This information reflects prices set forth in contracts between BellSouth and vendors, and is exempt from disclosure pursuant to Section 364.183 (3)(d). Disclosure of this information would cause competitive harm to BellSouth.
2. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Specifically, this information relates to revenue, and line counts for specific retail services. Consequently, 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.
3. This information contains contractual data, the disclosure of which would impair BellSouth's ability to contract for goods or services on favorable terms. Accordingly, it is exempt from disclosure pursuant to Section 364.183 (3)(d). Specifically, this is information provided to BellSouth as part of the performance of the contract with the vendor. The vendor considers this information to be proprietary, and BellSouth is contractually obligated to treat it as such.

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 2 of 12
04/23/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP

PRODUCTION OF DOCUMENT REQUEST NO. 15

<u>Location</u>	<u>Reason</u>
Page 3, Column L, Line 179	1
Page 4, Column L, Lines 180-188	1
Page 5, Column L, Lines 256-258	1
Page 6, Column L, Lines 360-362	1
Page 7, Column L, Lines 420-427	1
Page 8, Column L, Lines 428-429	1
Page 10, Column L, Lines 593-602	1
Page 11, Column L, Lines 629-638	1

PRODUCTION OF DOCUMENT REQUEST NO. 17

17 (a) (i)

<u>Location</u>	<u>Reason</u>
Column A, Lines 1-6	1
Column B, Lines 1, 2, 5, 6	1
Column C, Lines 1, 2, 5, 6	1
Column D, Lines 7-8	1
Column E, Lines 9-12	1
Column F, Lines 7-13	1
Column G, Lines 7-13	1

17 (b) (i)

Page 2, Column G, Lines 1-20	1
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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 3 of 12
04/23/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP

PRODUCTION OF DOCUMENT REQUEST NO. 17 (cont.)

<u>Location</u>	<u>Reason</u>
<u>17 (b) (ii)</u>	
Page 1, Column D, Lines 24, 26, 29, 31, 39, 42, 46, 48 51, 53	1
Page 1, Column G, Lines 24, 26, 29, 31, 34, 37, 39, 42, 46, 48, 51, 53	1
Page 2, Column D, Lines 61, 64, 80	1
Page 2, Column G, Lines 56, 59, 61, 64, 69, 73, 76, 80, 83 85, 88, 90, 93, 95, 101, 102, 107	1
Page 3, Column D, Lines 110, 114	1
Page 3, Column G, Lines 110, 114, 117, 119, 124, 126, 129, 131, 136, 138, 140, 142, 146, 148, 150, 152, 156, 158, 160, 162, 164, 166	1
Page 4, Column G, Lines 170, 172, 174, 176, 178, 180	1
Page 6, Column C, Lines 3, 4, 5, 6, 10, 11, 12, 13, 17, 20, 21, 23, 29, 33, 34, 35, 36	1
Page 7, Column C, Lines 3, 8, 13, 17, 19, 21, 23	1
<u>17 (f) (ii)</u>	
Page 1, Column E, Lines 1, 2, 4, 5	1
Page 1, Column F, Lines 2, 5	1
Page 1, Column G, Lines 3, 6	1
Page 3, Column A, Lines 2-6, 8-9	1
Page 3, Column C, Lines 8-9	1
Page 3, Column D, Lines 2-6, 8-9,	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 4 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 17 (cont.)

<u>Location</u>	<u>Reason</u>
<u>17 (f) (ii)</u>	
Page 3, Column E, Lines 11-18,	1
Page 3, Column F, Lines 11-18	1
Page 4, Column A, Lines 1-5, 7-11, 13-17	1
Page 4, Column B, Lines 3-6, 9-12, 15-18	1
Page 4, Column D, Lines 1-18	1
Page 5, Column A, Lines 1-14	1
Page 5, Column B, Lines 1-11, 14	1
Page 5, Column D, Lines 5, 7-8, 10-13	1
Page 6, Column A, Lines 1-13	1
Page 6, Column B, Lines 4-8, 10-12	1
Page 6, Columns D, Lines 1-3, 5-13	1
<u>17 (g) (i)</u>	
Page 3, Column B, Lines 1, 4-11, 13-14, 17-18, 20-26, 28-31, 34-36, 38-39, 43, 45, 47-50, 52-59, 62-65, 67	2
Page 3, Column C, Lines 1, 4-11, 13-14, 17-18, 20-26, 28-31, 34-36, 38-39, 43, 45, 47-50, 52-59, 62-65, 67	2
Page 5, Column B, Lines 1, 4-11, 13-14, 17-26, 28-31 34-36, 38-39, 43, 45, 47-50	2
Page 5, Column C, Lines 1, 4-11, 13-14, 17-26, 28-31 34-36, 38-39, 43, 45, 47-50	2
Page 6, Column B, Lines 52-59, 62-67	2
Page 6, Column C, Lines 52-59, 62-67	2
Page 8, Column B, Lines 1, 3-6, 8-13, 15-17, 19-26, 28-31, 34-36, 38-39, 41, 43, 45-62	2
Page 8, Column C, Lines 1, 3-6, 8-13, 15-17, 19-26,	2

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 5 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 17 (cont.)

<u>Location</u>	<u>Reason</u>
<u>17 (g) (i)</u> Page 8, Column C, Lines 28-31, 34-36, 38-39, 41, 43, 45-62	2
<u>17 (h) (i)</u> Column C, Lines 1-10	1
<u>17 (h) (ii)</u> Page 1, Column C, Lines 2-5, 7, 9-12, 16-18, 20-23, 25-26, 30-32, 34-37, 39-40, 45, 49-51, 53, 61, 66	1
Page 1, Column D, Lines 17, 23, 26, 31, 40	1
Page 1, Column E, Lines 15, 17, 23, 26, 43, 56	1
Page 1, Column F, Lines 23, 56	1
Page 1, Column G, Lines 56	1
Page 1, Column H, Lines 1, 8, 23, 44, 48, 54-56	1
Page 1, Column I, Lines 1, 8, 54-56	1
Page 2, Column C, Lines 70, 74, 76, 78, 80	1
<u>17 (i) (i)</u> Page 5, Column A, Line 2	1
Pages 16-35, Entire Page	3
Page 36, Column A, Lines 1-5, 7-14, 16-20, 23-29, 35-38, 41, 43, 48-49	1
Page 36, Column B, Lines 1-5, 7-14, 16-20, 23-29, 35-38, 41, 43, 48-49	
Page 36, Column C, Lines 1-14, 16-29, 35-38, 42-43, 48-49	1
Page 36, Column D, Lines 1-14, 16-29, 35-38, 42-43, 48-49	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 6 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 17 (cont.)

<u>Location</u>	<u>Reason</u>
<u>17 (j) (i)</u>	
Page 36, Column E, Lines 1-5, 7-14, 16-20, 23-40, 43-44, 48-49	1
Page 38, Column C, Lines 1-4	1

PRODUCTION OF DOCUMENT REQUEST NO. 21

<u>Location</u>	<u>Reason</u>
Page 1, Line 12	1
Page 2, Lines 10, 12	1
Page 3, Lines 10-11, 13	1
Page 4, Columns B & D, Lines 4-6	1
Page 4, Columns C & D, Lines 1 & 2	1
Page 4, Column D, Lines 3, 7	1
Page 5, Columns C-D, Lines 1-5	1
Page 5, Columns E-F, Lines 7-11	1
Page 5, Column D, Line 6	1
Page 5, Column F, Lines 12	1
Page 6, Line 14	1
Page 7, Columns B-D, Lines 2, 4, 6, 7, 9	1
Page 7, Column D, Line 10	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 7 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 7, Column F, Lines 11-16	1
Page 8, Line 13	1
Page 9, Lines 9, 11	1
Page 10, Lines 12, 14	1
Page 11, Lines 13, 14, 16	1
Page 12, Columns C-E, Lines 1-12	1
Page 12, Column E, Lines 13-15	1
Page 13, Column B, Lines 1-3	1
Page 14, Columns B, D, E, Lines 1-26	1
Page 15, Columns B & E, Line 4	1
Page 15, Columns C-E, Lines 1-2, 5-23	1
Page 15, Column E, Lines 3, 24, 25	1
Page 16, Columns B & F, Line 8	1
Page 16, Columns C, E, F, Lines 1-6, 9, 10	1
Page 16, Column F, Lines 7, 11	1
Page 17, Columns C, E-F, Lines 1-20, 23-31	1
Page 17, Column F, Lines 21-22, 32	1
Page 18, Line 18	1
Page 19, Line j (i)	1
Page 19, Columns B-D, Lines 2-3	1
Page 19, Columns B-E, Lines 4-8, 10, 12	1
Page 19, Columns C-D, Lines 13-14, 16-18, 20	1
Page 19, Column E, Lines 21, 22	1
Page 20, Entire Page	3
Page 21, Column B, Lines 4-7	1
Page 21, Column C, Line 18	1
Page 22, Line 12	1
Page 23, Columns C & D, Lines 1-2	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 8 of 12
04/23/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 23, Column D, Line 3	1
Page 23, Columns E & F, Lines 4-6	1
Page 23, Column F, Line 7	1
Page 24, Columns D & E, Line 1	1
Page 24, Column E, Lines 2-3	1
Page 25, Line 18	1
Page 26, Columns A-B, Line 7	1
Page 26, Column B, Lines 1-6, 8-13	1
Page 26, Line 17	1
Page 27, Columns B-H, Lines 1-8	1
Page 27, Columns D-H, Line 9	1
Page 28, Line 14	1
Page 29, Lines 11, 12, 14	1
Page 30, Columns C & D, Lines 1-2	1
Page 30, Column D, Lines 3, 7	1
Page 30, Columns B, D, Lines 4-6	1
Page 30, Column C, Line 8	1
Page 31, Lines 13, 14, 16	1
Page 32, Lines 13, 14, 16	1
Page 33, Columns C & D, Lines 1-10	1
Page 33, Column D, Lines 11, 15	1
Page 33, Columns B & D, Lines 12-14	1
Page 34, Columns B-C, Lines 1-3	1
Page 34, Column C, Lines 4, 9	1
Page 34, Columns A, C, Lines 5-8	1
Page 34, Column B, Line 10	1
Page 35, Line 17	1
Page 36, Lines 13-14, 16	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 9 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
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NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 37, Columns A-B, Lines 7	1
Page 37, Column B, Lines 1-6, 8-13	1
Page 37, Lines 17	1
Page 38, Columns B-H, Lines 1-8	1
Page 38, Columns D-H, Line 9	1
Page 39, Line 13	1
Page 40, Columns C & D, Lines 1-2	1
Page 40, Columns B & D, Lines 4-6	1
Page 40, Column C, Line 8	1
Page 40, Column D, Lines 3, 7	1
Page 41, Line 20	1
Page 42, Line a (i)	1
Page 42, Columns B-E, Lines 2-8, 12, 16-20	1
Page 42, Columns C-D, Lines 9-10, 13-14	1
Page 42, Column E, Lines 21-22	1
Page 43, Line 19	1
Page 44, Line 7	1
Page 45, Lines 13-14, 16	1
Page 46, Column C, Lines 2-9	1
Page 47, Columns C-E, Lines 1-12,	1
Page 47, Column E, Lines 13	1
Page 47, Columns F-H, Lines 14-17	1
Page 47, Column H, Lines 18-19	1
Page 48, Line 14	1
Page 49, Columns C-E, Lines 1-8	1
Page 49, Column E, Line 9	1
Page 49, Columns F-H, Lines 10-11, 13	1
Page 49, Columns F & H, Line 12	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 10 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 49, Column H, Lines 14-15	1
Page 50, Column C, Lines 1-7	1
Page 51, Line 16	1
Page 52, Columns B-D, Lines 1-12	1
Page 52, Column D, Line 13	1
Page 53, Columns B-D, Lines 1-5	1
Page 53, Column D, Lines 6-11	1
Page 54, Columns B-D, Lines 1-5, 7-9	1
Page 54, Column D, Lines 6, 10-12	1
Page 55, Column B, Lines 1-3	1
Page 56, Line 13	1
Page 57, Lines 11, 13	1
Page 58, Column A, Lines 2, 5-6,	1
Page 58, Column B, Lines 3, 7	1
Page 58, Column C, Lines 8-10	1
Page 58, Column D, Lines 11-12	1
Page 59, Columns C-E, Lines 1-7, 9-10, 12	1
Page 59, Columns C & E, Lines 8, 11, 13, 14	1
Page 59, Column E, Line 15	1
Page 60, Column B, Lines 1-3, 7-8	1
Page 60, Columns B-D, Lines 4, 9	1
Page 60, Column D, Line 10	1
Page 60, Column E, Lines 13, 16	1
Page 60, Columns E-G, Lines 14, 17	1
Page 61, Column D, Lines 1-5	1
Page 62, Line 12	1
Page 63, Columns B-D, Lines 1-6	1
Page 63, Columns E-G, Lines 7-9	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 11 of 12
04/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 63, Column G, Lines 10, 13	1
Page 63, Column F, Lines 11-12	1
Page 64, Column A, Line 1	1
Page 65, Columns B-D, Lines 1-5	1
Page 65, Column E, Lines 6, 8	1
Page 65, Columns C-D, Line 7	1
Page 65, Column C, Lines 9-10	1
Page 66, Columns A, Lines 1-3	1
Page 67, Columns C-E, Lines 1-15	1
Page 67, Column E, Line 16	1
Page 68, Columns C-E, Lines 2-3	1
Page 68, Column E, Lines 1, 4-9	1
Page 69, Line 13	1
Page 70, Columns C-D, Lines 1-3	1
Page 70, Columns B & D, Lines 5-7	1
Page 70, Column D, Lines 4, 8-9	1
Page 71, Line 14	1
Page 72, Lines 13, 14, 16	1
Page 73, Columns B-D, Lines 1-14	1
Page 73, Column D, Line 15	1
Page 73, Column F, Lines 16-21	1
Page 74, Columns B-D, Lines 1-5	1
Page 74, Column D, Lines 6-13	1
Page 74, Line 14	1
Page 75, Columns B-D, Lines 1-5	1
Page 75, Column D, Lines 6-12	1
Page 76, Line 16	1
Page 77, Lines 14, 16	1

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 981834-TP/990321-TP
Request for Confidential Classification
Page 12 of 12
04/23/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 3rd REQUEST FOR PRODUCTION OF DOCUMENTS,
REQUEST NOS. 15, 17 AND 21 FILED APRIL 2, 2003, IN FLORIDA DOCKET
NOS. 981834-TP AND 990321-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 21 (CONT.)

<u>Location</u>	<u>Reason</u>
Page 78, Columns B-D, Lines 2, 4, 6-13	1
Page 78, Column D, Lines 14	1
Page 78, Column F, Lines 15-20	1
Page 79, Line 12	1
Page 80, Lines 11,13	1
Page 80, Column A	1
Page 81, Lines 11-12, 14	1
Page 82, Columns C-D, Lines 1-2	1
Page 82, Columns B & D, Lines 4-7	1
Page 82, Column D, Lines 3, 8	1
Page 83, Columns C-D, Lines 1-8	1
Page 83, Column D, Lines 9, 14	1
Page 83, Columns B & D, Lines 10-13	1
Page 84, Columns C-D, Line 1	1
Page 84, Columns B-D, Lines 3-5	1
Page 84, Column D, Lines 2, 6	1
Page 85, Line 18	1
Page 86, Columns B-D, Lines 1-2, 5-7	1
Page 86, Columns A & D, Line 4	1
Page 86, Column D, Lines 3, 8	1
Page 87, Line 13	1
Page 88, Columns B-D, Lines 2, 5,	1
Page 88, Column D, Lines 6-12	1
Page 88, Line 13	1
Page 89, Columns B-D, Lines 2, 5	1
Page 89, Columns A & D, Line 9	1
Page 89, Column D, Lines 6-8, 10-13	1