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May 5, 2003

Mrs. Blanca S. Bayó
Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850


**Re: Docket No.: 020919-TP
Complaint of AT&T Communications of the Southern States, LLC,
Teleport Communications Group, Inc., and TCG South Florida for
Enforcement of Interconnection
Agreements with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for its Responses to Florida Public Service Commission Staff's First Request for Production of Documents, Request No. 1, 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,


Andrew D. Shore (CA)

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

DOCUMENT NUMBER-DATE

04058 MAY-5 8

FPSC-COMMISSION CLERK


**CERTIFICATE OF SERVICE
DOCKET NO. 020919-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (*), electronic mail and First Class U.S. Mail this 5th day of May 2003 to the following:

Patricia Christensen (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Andrew D. Shore (CA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for arbitration)
concerning complaint of AT&T)
Communications of the Southern)
States, LLC, Teleport)
Communications Group, Inc., and)
TCG South Florida for)
enforcement of interconnection)
agreements with BellSouth)
Telecommunications, Inc.)
_____)

Docket No. 020919-TP

Filed: May 5, 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 28, 2003, BellSouth filed its response to Florida Public Service Commission Staff's First Request for Production of Documents. BellSouth's Response to Staff's First Request for Production of Documents, Request No. 1, 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 Response to Staff's First Request for Production of Documents, Request No. 1 includes 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 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 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 5th day of May, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

JAMES MEZA III

c/o Nancy Sims

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(LA)

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S 1ST REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST NO. 1,
FILED APRIL 28, 2003, IN
FLORIDA DOCKET NO. 02919-TP**

Explanation of Proprietary Information

1. This information contains contractual data. Specifically, this information relates to a Confidential Settlement Agreement entered into between BellSouth and the ALEC. Accordingly, it is exempt from disclosure pursuant to Section 364.183 (3)(d). This information reflects confidentiality terms set forth in the Settlement Agreement between BellSouth and the ALEC, and BellSouth is contractually obligated to treat it as such.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 020919-TP
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05/05/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S 1ST REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST NO. 1,
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PRODUCTION OF DOCUMENT REQUEST NO. 1

<u>Location</u>	<u>Reason</u>
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