

ORIGINAL

Legal Department

E. EARL EDENFIELD, JR.
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0763

May 9, 2003

RECEIVED-FPSC
03 MAY -9 PM 4:48
COMMISSION
CLERK

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

Re: 030349-TP (Supra \$75 Cash Back Promotion)

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,

E. Earl Edenfield, Jr.
E. Earl Edenfield, Jr. (UA)

Enclosures

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

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

RECEIVED & FILED
Th
FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN04226-03. 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. 03599-03)

DOCUMENT NUMBER-DATE

04225 MAY-98

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 030349-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 9th day of May 2003 to the following:

Wayne Knight
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
wknight@psc.state.fl.us

Adenet Medacier, Esq.
Jorge L. Cruz-Bustillo, Esq.
Legal Department
Supra Telecommunications and
Information Systems, Inc.
2620 S.W. 27th Avenue
Miami, Florida 33133
Tel. No. (305) 476-4240
Fax. No. (305) 443-9516
amedacier@stis.com
jorge.cruz-bustillo@stis.com

E. Earl Edenfield, Jr.
E. Earl Edenfield, Jr. (UA)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Supra Telecommunications)
and Information Systems, Inc., for Expedited)
Review and Cancellation of BellSouth)
Telecommunications, Inc.'s \$75 Cash Back)
Promotional Tariffs (T-030132) and For)
Investigation into BellSouth Telecommunications,)
Inc. Promotional Pricing and Marketing Practices)
_____)

Docket No. 030349-TP

Filed: May 9, 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 this Request for Specified Confidential Classification.

1. On April 18, 2003, Supra Telecommunications and Information Systems, Inc., ("Supra") filed with the Florida Public Service Commission ("FPSC") its Emergency Complaint and Request for Expedited Relief against BellSouth Telecommunications, Inc. ("BellSouth"). Said Petition contains information and Exhibits which Supra understood contained BellSouth proprietary and confidential information. On April 21, 2003, Supra filed a Letter claiming confidentiality for portions of the Petition and some Exhibits.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in Supra's Petition and the Exhibits includes 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, proprietary business 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.

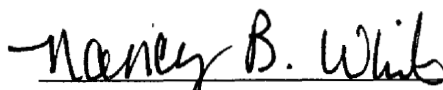
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

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.

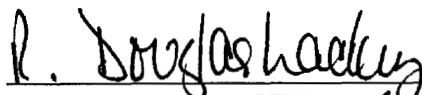
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 9th day of May 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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



R. DOUGLAS LACKEY (CA)
E. EARL EDENFIELD JR.
General Attorneys
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0763

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030349-TP
Request for Confidential Classification
Page 1 of 2
05/09/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF PORTIONS OF SUPRA'S
PETITION AND EXHIBITS 'E' AND 'G' IN FPSC DOCKET 030349-TP FILED ON
APRIL 18, 2003.**

Explanation of Proprietary Information

1. This information reflects BellSouth's business strategy relating to its competitive marketing position. Specifically, this information discusses, describes and evaluates BellSouth's internal systems used in potential strategic responses to various competitive scenarios; key details relating to the substance of such systems as well as developmental time frame information and implementation information; and discusses/evaluates recommendations on these potential competitive response. BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this 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. 030349-TP
Request for Confidential Classification
Page 1 of 2
05/09/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF PORTIONS OF SUPRA'S
PETITION AND EXHIBITS 'E' AND 'G' IN FPSC DOCKET 030349-TP FILED ON
APRIL 18, 2003.

PETITION

<u>Location</u>	<u>Reason</u>
Page 12, Paragraph #24, Lines 5-10	1
Page 12, Paragraph #25, Lines 1-3	1
Page 13, Paragraph # 25, Lines 1-2	1
Page 13, Paragraph # 26, Lines 1-4	1
Page 13, Paragraph # 28, Lines 1, 3, 4	1
Page 14, Paragraph # 28, Lines 1-12, 16-28	1
Page 15, Paragraph # 29, Lines 1-3	1
Page 16, Paragraph # 29, Lines 11-14, 23-26	1

EXHIBITS

Exhibit E

Location: Entire Document 1

Exhibit G

Location: Entire Document 1