Meredith E. Mays Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0750

July 18, 2003

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: Docket No. 020507-TL (FCCA Complaint)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses and Objections to MCI's 1<sup>st</sup> Interrogatories Item Nos. 4, 5, 7, 8, 9 and 10, 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,

Meredith E. Mays (KA)

Enclosure

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

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### CERTIFICATE OF SERVICE DOCKET NO. 020507-TL

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

Electronic Mail and U.S. Mail this 18<sup>th</sup> day of July 2003 to the following:

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Meredith E. Mays (WA)

(+) Signed Protective Agreement

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of the Florida	)
Competitive Carriers Association	) Docket No. 020507-TL
Against BellSouth Telecommunications, Inc.	)
And Request for Expedited Relief	) .
	) Filed: July 18, 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 July 10, 2003, BellSouth Telecommunications, Inc. filed its Responses and Objections to MCImetro Access Transmission Services, LLC and MCI WorldCom's First Set of Interrogatories ("MCI"). In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to Interrogatory Nos. 4, 5, 7, 8, 9 and 10. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification of the responses and documents provided in response to MCI's 1<sup>st</sup> Interrogatories as they contain competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.
- 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 18th day of July, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

NANCY B. WHITE

JAMES MEZA III

c/o Nancy Sims

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R. DOUGLA'S LACKEY

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#### **ATTACHMENT A**

BellSouth Telecommunications, Inc. FPSC Docket No. 020507-TL Request for Confidential Classification Page 1 of 2 7/18/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO MCI's 1<sup>st</sup> INTERROGATORIES, ITEM NOS. 4, 5, 7, 8, 9 and 10 AS FILED JULY 10, 2003, IN FLORIDA DOCKET NO. 020507-TL

#### **Explanation of Proprietary Information**

1. This information contains competitive business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. In addition, this information is purchased from individual marketing research firms, hired on behalf of BellSouth to conduct market research. Therefore, such information is trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act. Fl. Stat. § 364.183 (3)(e).

#### **ATTACHMENT A**

BellSouth Telecommunications, Inc. FPSC Docket No. 020507-TL Request for Confidential Classification Page 2 of 2 7/18/03

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO MCI's 1<sup>st</sup> INTERROGATORIES, ITEM NOS. 4, 5, 7, 8, 9 and 10 AS FILED JULY 10, 2003, IN FLORIDA DOCKET NO. 020507-TL

Location	Reason
Response to Interrogatory No. 4	
Page 2, Lines 2-4, Columns B-I	1
Response to Interrogatory No. 5	
Page 2, Lines 2-4, Columns B-I	1
Response to Interrogatory No. 7	
Figure on Line 2	1
Response to Interrogatory No. 8	
Figure on Line 2	1
Response to Interrogatory No. 9	
Page 2, Line 2, Columns H-I Page 2, Line 4, Columns D-I Page 2, Line 5, Columns G-I	1 1 1
Response to Interrogatory No. 10	
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