

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of the Florida Competitive  
Carriers Association Against BellSouth  
Telecommunications, Inc. Regarding  
BellSouth's Practice of Refusing to Provide  
FastAccessInternet Service to Customers  
who Receive Voice Service from a Competitive  
Voice Provider, and Request for Expedited Relief

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Docket No. 020507-TP

Filed. August 7, 2003

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION AND MOTION FOR  
PROTECTIVE ORDER FOR SUPPLEMENTAL CONFIDENTIAL RESPONSE TO  
BELLSOUTH TELECOMMUNICATIONS, INC.'S  
SECOND SET OF INTERROGATORIES (NO. 4)**

AT&T Communications of the Southern States, LLC (AT&T), pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Specified Confidential Classification and Motion for Protective Order.

1. On July 17, 2003, AT&T filed its Confidential Supplemental Response to BellSouth Telecommunications, Inc.'s (BellSouth) Second Set of Interrogatories, No. 4. On the same day, AT&T filed its Notice of Intent to Request Specified Confidential Classification.

2. AT&T's supplemental confidential response to BellSouth Interrogatory No. 4 contains information specifically related to AT&T's business operations. AT&T considers this information to be confidential, proprietary business information. The confidential information is related to the number of lines AT&T has and how such lines are provisioned. Disclosure of the information would harm AT&T's competitive business interests. The information has not been made public and is governed by a Protective Agreement between the parties. A more specific description of this information is contained in Attachment A.

3. Section 364.183, Florida Statutes, provides an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure of confidential business information would "impair the competitive business of the provider of the information." Disclosure of the AT&T confidential information would harm its business operations by placing

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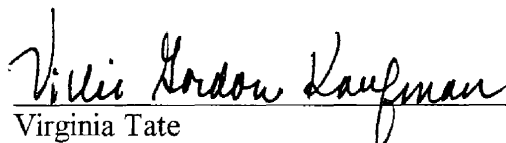
details of its operations and capabilities in the public domain. Accordingly, the information should be exempt from the public disclosure requirements of section 119.07, Florida Statutes.

4. AT&T treats the information for which confidential classification is sought as private and confidential.

5 Appended hereto as Attachment B are two copies of the requested documents with the confidential information redacted.

6 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, AT&T 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.



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**ATTACHMENT A**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
AT&T's Supplemental Response to BellSouth's Interrogatory No. 4  
DOCKET NO. 020507-TP**

**Explanation of Proprietary Information**

1. The information provided by AT&T in its supplemental response to BellSouth's Interrogatory No. 4 contains confidential, proprietary business information regarding the number of lines AT&T has and how such lines are provisioned. This information is related to AT&T's ongoing business affairs and can be used by AT&T's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing AT&T Communications of the Southern States, LLC's Request for Specified Confidential Classification and Motion for Protective Order for Supplemental Confidential Response to Bellsouth Telecommunications, Inc.'s Second Set of Interrogatories (No. 4) has been furnished by (\*) hand delivery or by U.S. Mail this 7th day of August 2003, to the following:

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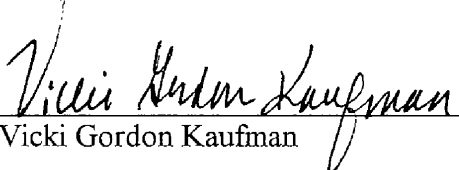
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