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August 27, 2003

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

030869-TL

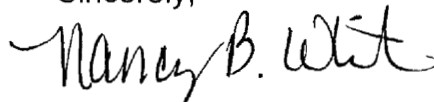
RE: Docket No. NEW Docket

Dear Mrs. Bayo:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification and Motion for Permanent Protective Order. Please file these documents 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 on the parties shown on the attached Certificate of Service.

Sincerely,



Nancy B. White (UA)

Enclosures

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

DOCUMENT NUMBER-DATE

08021 AUG 27 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications,)
Inc., for Implementation of Section 364.164,)
Florida Statutes)
_____)

Docket No.: _____

Filed: August 27, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PERMANENT PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order for exhibits to the testimony of Mr. Steve Bigelow and Ms. Daonne Caldwell filed in the above captioned docket on August 27, 2003.

1. BellSouth is filing its Request for Confidential Classification and Motion for Protective Order for these exhibits because BellSouth deems the information therein to be confidential and proprietary business information in that it reflects cost studies of various services. Since competitors who will offer such services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the information with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the information with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. This information is entitled to proprietary confidential classification for the following reasons. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in these interrogatories, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

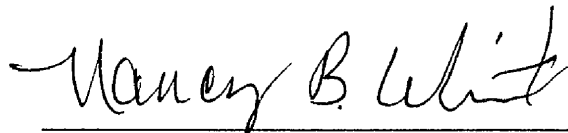
6. BellSouth is filing this Request for Confidential Classification and Motion for Permanent Protective Order so that the Commission Staff and the Office of Public Counsel may receive copies of the complete filing made by BellSouth in the above captioned docket.

7. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

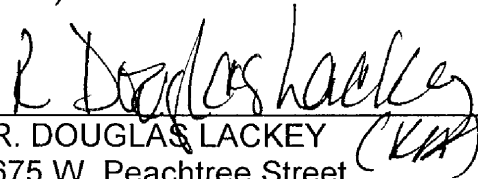
WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above and contained in the exhibits of the testimony of Steve Bigelow and Daonne Caldwell to be confidential proprietary business information, and thus not subject to public disclosure.

Respectfully submitted this 27th day of August 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS TO THE
TESTIMONY OF D.DAONNE CALDWELL AND STEVE BIGELOW FILED IN
BELLSOUTH'S PETITION FOR IMPLEMENTATION OF SECTION 364.164,
FLORIDA STATUTES.**

Explanation of Proprietary Information

1. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. BellSouth is not able to obtain its competitors' costs to provide service. Therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. For these reasons, the public disclosure of the information would impair the competitive business of BellSouth, and the information is, therefore, entitled to confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, 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.
2. Some of this information includes prices negotiated by BellSouth with a specific vendor, Telcordia. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. Also, all of the information is proprietary to a vendor, Telcordia. This information relates to the SCIS (Switching Cost Information System) model developed by Telcordia. There is also information in the SNC (Switched Network Calculator) model of BellSouth that is derived from the SCIS. The SCIS is a model that Telcordia considers to be proprietary, and BellSouth is contractually bound by an agreement with Telcordia to treat it as such. This model incorporates information given to Telcordia by switch vendors, as well as programming algorithms developed by Telcordia to translate the switch vendor information into cost profiles for various applications. This computer model has been developed by Telcordia over the course of more than a decade at a cost of tens of millions of dollars. If any of this

ATTACHMENT A

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information were made publicly available, the value of Telcordia's model and the related services it provides would decrease dramatically. Accordingly, this information is also both competitively sensitive and a trade secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), (d) and (e), Florida Statutes and is exempt from the Open Records Act.

LOCATION

REASON

CALDWELL'S EXHIBITS

DDC-1 (Entire Document & CDs of Basic Local service Study & BSTLM Loop Model)	1
DDC-2 Page 1-2 (Column D, E, & F)	1
DDC-4 (Non-Recurring Cost Column)	1
SCIS model developed by Telcordia (Entire Document and CD)	2

BIGELOW'S EXHIBITS

EXHIBIT SB1

Page 1 of 13 through 5 of 13, Column 10, 11, & 12	1
Page 6 of 13, Column 1, 2 and 3	1
Page 8 of 13, column 10, 11, 12	1
Page 9 of 13, column 1, 2, and 3	1
Page 11 of 13, column 10, 11, 12	1
Page 12 of 13, column 1, 2, and 3	1

ATTACHMENT A

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EXHIBIT SB2

Pages 1 of 13 – Page 5 of 13, Column 10, 11, & 12	1
Page 6 of 13, Column 1, 2, & 3	1
Page 8 of 13, Column 10, 11, & 12	1
Page 9 of 13, Column 1, 2, & 3	1
Page 11 of 13, Column 10, 11, 12	1
Page 12 of 13, Column 1, 2, 3	1

EXHIBIT SB3

Page 1 of 67 – Column 11, 12, & 13	1
Page 4 of 67 – Page 57 of 67, Column 10, 11 & 12	1
Page 61 of 67 – Page 62 of 67, Column 10, 11, & 12	1
Page 65 of 67 – Column 10, 11, & 12	1

EXHIBIT SB4

Page 1 – Column 11, 12, & 13	1
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