

# ORIGINAL

Legal Department

J. Phillip Carver  
Senior Attorney

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

September 9, 2003

RECEIVED TISSO  
03 SEP - 9 PM 4: 26  
COMMISSION  
CLERK

Mrs. Blanca S. Bayó  
Director, Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket Nos. 981834-TP and 990321-TP (Generic Collocation)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request 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.

RECEIVED & FILED

*TH*  
FPSC-BUREAU OF RECORDS

Sincerely,

*J. Phillip Carver*  
J. Phillip Carver (UA)

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL  \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC  \_\_\_\_\_  
OTH \_\_\_\_\_

*cc: conf records*

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 08525-03. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE

08524 SEP-9 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 981834-TP and 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Federal Express (\*), First Class U.S. Mail and Electronic Mail this 9th day of September, 2003 to the following:

Beth Keating, Staff Counsel  
Adam Teitzman, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6212  
Fax. No. (850) 413-6250  
[bkeating@psc.state.fl.us](mailto:bkeating@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

FPSC Staff By E-Mail Only:  
[amaurey@psc.state.fl.us](mailto:amaurey@psc.state.fl.us)  
[bgardner@psc.state.fl.us](mailto:bgardner@psc.state.fl.us)  
[bcasey@psc.state.fl.us](mailto:bcasey@psc.state.fl.us)  
[cbulecza@psc.state.fl.us](mailto:cbulecza@psc.state.fl.us)  
[david.dowds@psc.state.fl.us](mailto:david.dowds@psc.state.fl.us)  
[jschindl@psc.state.fl.us](mailto:jschindl@psc.state.fl.us)  
[jebrown@psc.state.fl.us](mailto:jebrown@psc.state.fl.us)  
[lking@psc.state.fl.us](mailto:lking@psc.state.fl.us)  
[plee@psc.state.fl.us](mailto:plee@psc.state.fl.us)  
[pwickery@psc.state.fl.us](mailto:pwickery@psc.state.fl.us)  
[plester@psc.state.fl.us](mailto:plester@psc.state.fl.us)  
[sasimmon@psc.state.fl.us](mailto:sasimmon@psc.state.fl.us)  
[sbbrown@psc.state.fl.us](mailto:sbbrown@psc.state.fl.us)  
[scater@psc.state.fl.us](mailto:scater@psc.state.fl.us)  
[tbrown@psc.state.fl.us](mailto:tbrown@psc.state.fl.us)  
[vmckay@psc.state.fl.us](mailto:vmckay@psc.state.fl.us)  
[zring@psc.state.fl.us](mailto:zring@psc.state.fl.us)

Joseph A. McGlothlin  
Vicki Gordon Kaufman  
Timothy Perry  
McWhirter, Reeves, McGlothlin,  
Davidson, Decker, Kaufman, Arnold,  
& Steen, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Attys. for FCCA  
Attys. for Network Telephone Corp.  
Attys. for BlueStar  
Attys. For Covad  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
[tperry@mac-law.com](mailto:tperry@mac-law.com)

Richard A. Chapkis (+)  
Terry Scobie  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)  
[terry.scobie@verizon.com](mailto:terry.scobie@verizon.com)

Paul Turner  
Supra Telecommunications & Info.  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Tel. No. (305) 476-4247  
Fax. No. (305) 476-4282  
[pturner@stis.com](mailto:pturner@stis.com)

Susan S. Masterton (+)  
Sprint Comm. Co. LLP  
1313 Blair Stone Road (32301)  
P.O. Box 2214  
MC: FLTLHO0107  
Tallahassee, FL 32316-2214  
Tel. No. (850) 847-0244  
Fax. No. (850) 878-0777  
[Susan.masterton@mail.sprint.com](mailto:Susan.masterton@mail.sprint.com)

Sprint-Florida, Incorporated  
Mr. F. B. (Ben) Poag  
P.O. Box 2214 (MC FLTLHO0107)  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1027  
Fax. No. (407) 814-5700  
[Ben.Poag@mail.sprint.com](mailto:Ben.Poag@mail.sprint.com)

William H. Weber, Senior Counsel  
Gene Watkins (\*)  
Covad Communications  
1230 Peachtree Street, N.E.  
19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax. No. (404) 942-3495  
[wweber@covad.com](mailto:wweber@covad.com)  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Rodney L. Joyce  
Shook, Hardy & Bacon, L.L.P.  
600 14th Street, N.W.  
Suite 800  
Washington, D.C. 20005-2004  
Tel. No. (202) 639-5602  
Fax. No. (202) 783-4211  
Counsel for Network Access Solutions  
[rojce@shb.com](mailto:rojce@shb.com)

Verizon Florida, Inc.  
Ms. Michelle A. Robinson  
%Mr. David Christian  
106 East College Avenue  
Suite 810  
Tallahassee, FL 32301-7704  
Tel. No. (813) 483-2526  
Fax. No. (813) 223-4888  
[Michelle.Robinson@verizon.com](mailto:Michelle.Robinson@verizon.com)  
[David.Christian@verizon.com](mailto:David.Christian@verizon.com)

Ms. Lisa A. Riley  
Virginia C. Tate  
1200 Peachtree Street, N.E.  
Suite 8066  
Atlanta, GA 30309-3523  
Tel. No. (404) 810-7812  
Fax. No. (404) 877-7646  
[lriley@att.com](mailto:lriley@att.com)  
[vtate@att.com](mailto:vtate@att.com)

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801  
Tel. No. (407) 835-0460  
Fax. No. (407) 835-0309  
[mfeil@floridadigital.net](mailto:mfeil@floridadigital.net)

Catherine K. Ronis, Esq.  
Daniel McCuaig, Esq. (+)  
Jonathan J. Frankel, Esq.  
Wilmer, Cutler & Pickering  
2445 M Street, N.W.  
Washington, DC 20037-1420  
Tel. No. (202) 663-6000  
Fax. No. (202) 663-6363  
[catherine.ronis@wilmer.com](mailto:catherine.ronis@wilmer.com)  
[daniel.mccuaig@wilmer.com](mailto:daniel.mccuaig@wilmer.com)

Jonathan Audu  
c/o Ann Shelfer  
Supra Telecommunications and  
Information Systems, Inc.  
1311 Executive Center Drive  
Koger Center - Ellis Building  
Suite 200  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[ashelfer@stis.com](mailto:ashelfer@stis.com)  
[jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

Mickey Henry  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, Georgia 30309-3523  
Tel. No. (404) 810-2078  
[michaeljhenry@att.com](mailto:michaeljhenry@att.com)

Mellony Michaux (by e-mail only)  
AT&T  
[mmichaux@att.com](mailto:mmichaux@att.com)

Roger Fredrickson (by e-mail only)  
AT&T  
[rfrederickson@att.com](mailto:rfrederickson@att.com)

Tracy W. Hatch, Esq. (+)  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street, Ste. 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
Fax No. (850) 425-6361  
[thatch@att.com](mailto:thatch@att.com)

Floyd Self  
Messer, Caparelo & Self  
Post Office Drawer 1876  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Co-counsel for AT&T  
[fself@lawfla.com](mailto:fself@lawfla.com)

  
\_\_\_\_\_  
J. Phillip Carver (KA)

**(+) Signed Protective Agreement**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers  
for Commission action to support local ) Docket No. 981834-TP  
competition in BellSouth )  
Telecommunications, Inc.'s service )  
Territory )

In re: Petition of ACI Corp. d/b/a )  
Accelerated Connections, Inc. for ) Docket No. 990321-TP  
Generic Investigation into Terms and )  
Conditions of Physical Collocation )

Filed: September 9, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF  
INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

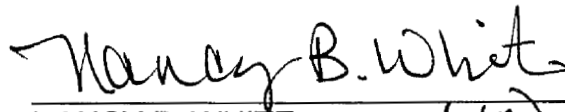
1. On September 9, 2003, BellSouth Telecommunications, Inc. filed the its Responses and Objections to Covad's 1<sup>st</sup> Request for Production of Documents in this docket. In response to Covad's 1<sup>st</sup> Request for Production, Item No. 1, BellSouth will produce documents that contain vendor specific pricing information that is considered proprietary to BellSouth upon execution by Covad of a confidentiality agreement. BellSouth is also providing a copy of the documents to the Commission Staff.

2. Because this information contains proprietary information, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of these responses without

delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record. BellSouth will be filing a Request for Confidential Classification within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 9<sup>th</sup> day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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



J. PHILLIP CARVER (KA)  
R. DOUGLAS LACKEY  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0710