

ORIGINAL

Legal Department

Nancy B. White
General Counsel - FL

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5558

September 12, 2003

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

RECEIVED- FPSC
03 SEP 12 AM 10:29
COMMISSION
CLERK

031072-TL
MH

**Re: ~~Undocketed Matter:~~
PricewaterhouseCoopers (PwC) to Conduct Change Control Process**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for BellSouth's Responses to Item Nos. 2 and 7, which contain confidential information, we ask that you file this pleading in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me.

Sincerely,

Nancy B. White

Nancy B. White (CA)

Enclosures

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

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IH
FPSC-BUREAU OF RECORDS

AUS
CAF
CMP
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cc: *conf records*

This request for confidentiality was filed by or on behalf of a telecommunications company for undocketed Confidential Document No. 08616-03. No ruling is required unless the material is subject to a request per 119.07, FS. Your division director must obtain written permission from the EXD/Tech for you to access the confidential material.

DOCUMENT NUMBER-DATE
08615 SEP 12 03
FPSC-COMMISSION CLERK

business. Therefore, such information should be classified as confidential 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.

4. 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.

5. Attachment B to BellSouth's Request for Confidential Classification contains two redacted copies of the documents containing the confidential information.

6. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

7. 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.

8. 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 12th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KW)
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504577

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 1

Page 1 of 1

REQUEST: What impelled BellSouth to undertake the audit of its capacity allocation process at this time?

RESPONSE: This audit/attestation responds to your Commission's Order No. PSC-02-1034-FOF-TP, page 7, that states, "BellSouth has committed to independent third-party verification of capacity used and remaining after each new software release." This audit/attestation is also in response to a Georgia PSC Order Docket No. 7892-U, to ensure ordered CCP changes and the 50-50 plan have been implemented.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 2

Page 1 of 1

- REQUEST:
- a. Was a Request For Proposal distributed to potentially interested auditors prior to selecting PwC to perform the audit? If so, please provide.
 - b. Please list other projects currently being conducted by PwC for BellSouth.

- RESPONSE:
- a. Yes, a Request for Proposal (RFP) was sent to two auditors – PwC and Deloitte & Touche – who qualify to conduct this project. The RFP attached is proprietary and subject to a non-disclosure agreement.
 - b. Please see the responsive attachments provided, which contain proprietary information subject to a nondisclosure agreement.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 2

Attachment 1

PROPRIETARY

ATTACHMENT

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 2

Attachment 2

PROPRIETARY

ATTACHMENT

- REQUEST:
- a. Who made the decision to hire PwC? Please describe the factors weighed in PwC's selection.
 - b. Who will oversee PwC in the course of its work?
 - c. Will PwC have full access to any and all personnel including vendors and to documents and processes?

RESPONSE:

- a. Kathy Wilson-Chu, concurred by Bill Stacy, made the decision to hire PwC. The factors that produced this decision were that PwC was more familiar with this subject matter due to the regionality effort they performed for BellSouth a couple years ago, PwC's bid was less costly, and PwC indicated they could complete the audit on a much more timely basis. Lastly, input from another BellSouth department who had worked with D&T in a previous engagement produced a negative concern about D&T.
- b. Kathy Wilson-Chu oversees PwC in this engagement with BellSouth, with concurrence from Bill Stacy and BellSouth Legal as well.
- c. Yes.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 4

Page 1 of 1

- REQUEST:
- a. Please define the scope of the work to be done by PwC and provide documentation concerning its scope, objectives, methodologies, project plan and the operational practices it will review.
 - b. Did BellSouth receive input outside of PwC and internal parties regarding the scope?

- RESPONSE:
- a. The scope of this audit/attestation is exactly as its defined in the GA PSC Order Docket No. 7892-U and FL PSC Order PSC-02-1034-FOF-TP, which is to ensure BellSouth is compliant with the 50-50 plan and to ensure BellSouth made the CCP changes ordered by the GA PSC. This is documented in the attached RFP. The methodologies and project plan are documented in PwC's response to the RFP, which is also attached.
 - b. As stated above, the scope was entirely set by the GA and FL PSCs' Orders.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 5

Page 1 of 1

REQUEST: Does the audit provide for input from parties other than internal BellSouth functions or PwC personnel? If so, what parties, how and when?

RESPONSE: PwC has interviewed BellSouth's key software vendors who produce changes to the CLEC interfaces governed by the CCP.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 6

REQUEST: Please discuss the report's timing and content and to whom the final reports will be distributed.

RESPONSE: There will be two reports issued: the first report will be issued shortly, and will describe the CCP changes portion of this project, as well as PwC's review of the 1st Quarter 2003 Post Release Capacity Utilization Report for 50-50 compliance. The second and final report will be in March 2004, covering the remaining 2nd – 4th Quarters 2003 Post Release Capacity Reports review by PwC. These reports will be filed with the GA PSC and will be available

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 7

Page 1 of 1

REQUEST: Please provide the contract and any other relevant documents between BellSouth and PwC for the audit. Include all related correspondence between BellSouth personnel and PwC prior to the consummation of the contract for the audit.

RESPONSE: The contract with PwC, which is a confidential, proprietary document; is attached.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 7

Attachment 1

PROPRIETARY

ATTACHMENT

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 7

Attachment 2

PROPRIETARY

ATTACHMENT

BellSouth Telecommunications, Inc.

PricewaterhouseCoopers Review of CCP

September 8, 2003

Item No. 8

Page 1 of 1

REQUEST: Please list the names of PwC personnel who will work on the audit, their backgrounds, and contact information.

RESPONSE: The PwC personnel and their backgrounds are listed in PwC's RFP response (pages 7-10) which BellSouth provided as a response to Item No. The attachment is proprietary and subject to a nondisclosure agreement. The primary PwC contacts for this audit are Dow Smith, at 678-419-1016 and Mike Lawley at 678-419-2256.

RESPONSE BY: Kathy Wilson-Chu

BellSouth Telecommunications, Inc.

Pricewaterhouse Coopers Review of CCP

September 8, 2003

Item No. 9

Page 1 of 1

REQUEST: Please identify a mechanism by which FPSC might monitor audit progress.

RESPONSE: The Florida Public Service Commission can monitor this project's progress via Nancy Sims' office who will contact Kathy Wilson-Chu.

RESPONSE BY: Kathy Wilson-Chu

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Staff's Data Request of August 28, 2003
Request for Confidential Classification**

**Page 1 of 2
09/12/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S DATA REQUEST OF AUGUST 28, 2003
ATTACHMENTS TO ITEM NOS. 2 AND 7 FILED 09/12/03**

Explanation of Proprietary Information

1. This information is business related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Consequently, 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. This information is relating to competitive interests. The disclosure of such information would impair the competitive business of PriceWaterhouseCoopers. Consequently, 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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
Staff's Data Request of August 28, 2003
Request for Confidential Classification**

**Page 1 of 2
09/12/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S DATA REQUEST OF AUGUST 28, 2003
ATTACHMENTS TO ITEM NOS. 2 AND 7 FILED 09/12/03**

RESPONSE TO ITEM NO. 2 ATTACHMENT 1

Location

Entire Document

Reason

2

RESPONSE TO ITEM NO. 2 ATTACHMENT 2

Location

Entire Document

Reason

1

DOCUMENTS IN RESPONSE TO ITEM NO. 7

Location

Entire Document

Reasons

1 and 2