

JAMES MEZA III  
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BellSouth Telecommunications, Inc.  
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ORIGINAL

September 12, 2003

RECEIVED-FPSC  
03 SEP 12 PM 4:43  
COMMISSION  
CLERK

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: 030349-TP (Supra \$75 Cash Back Promotion)

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its response to Supra Telecommunications & Information Systems, Inc.'s First Request for Production Nos. 1, 4 and 5 (same as Late-Filed Hearing Exhibit No. 7), 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,

*James Meza III*  
James Meza III (KA)

Enclosures

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1  
OTH \_\_\_\_\_  
cc: *conf records*

This confidentiality request was filed by or for a "telco" for DN 08680-03. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.  
(See DN 07860-03)

DOCUMENT NUMBER-DATE  
08679 SEP 12 03  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 030349-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and Federal Express this 12th day of September, 2003 to the following:

Linda Dodson  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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[ldodson@psc.state.fl.us](mailto:ldodson@psc.state.fl.us)

Adenet Medacier, Esq.  
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Supra Telecommunications and  
Information Systems, Inc.  
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James Meza III (CA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by Supra Telecommunications ) Docket No. 030349-TP  
and Information Systems, Inc., against BellSouth )  
Telecommunications, Inc. regarding BellSouth's )  
alleged use of carrier to carrier information ) Filed: September 12, 2003  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification and states as follows:

1. On August 22, 2003, BellSouth filed its response to Supra Telecommunications and Information Systems Inc.'s ("Supra") First Request for Production of Documents. BellSouth's Response to Supra's First Request for Production of Documents, Request No. 1 contains information that is proprietary to BellSouth. BellSouth also filed a Notice of Intent to Request Specified Confidential Classification on that same day.
2. On August 26, 2003, BellSouth provided its response to Supra's First Request for Production of Documents, Request No. 4, which contains information that is proprietary and confidential to BellSouth.
3. On September 5, 2003, BellSouth filed a Late-Hearing Exhibit No. 7 (also referenced as First Request for Production of Docs. No. 5) which contains information that is proprietary and confidential to BellSouth. BellSouth also filed a Notice of Intent to Request Specified Confidential Classification on that same day.

4. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Responses to Supra's First Request for Production of Document, Request Nos. 1, 4 and 5 include confidential, proprietary information utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to BellSouth and provide competitors with an unfair advantage. Further, portions of the subject information contain customer, proprietary information, which is prohibited from being disclosed under Florida Law. The information discussed herein is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary 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.

5. 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.

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

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

8. 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.

9. 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.

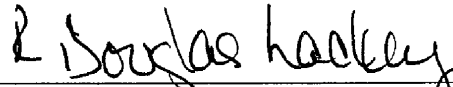
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 12th day of September 12, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE (KA)  
JAMES MEZA III  
c/o Nancy Sims  
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(305) 347-5558



E. Earl Edenfield, Jr. (KA)  
R. DOUGLAS LACKEY  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0763

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030349-TP  
Request for Confidential Classification  
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09/12/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSE TO SUPRA' 1<sup>ST</sup> REQUEST FOR PRODUCTION OF DOCUMENTS,  
REQUEST NO. 1 FILED AUGUST 22, 2003,  
REQUEST NO. 4 FILED AUGUST 26, 2003, AND  
REQUEST NO. 5 (LATE-FILED HEARING EXHIBIT NO. 7) FILED  
SEPTEMBER 5, 2003  
IN FLORIDA DOCKET NO. 030349-TP**

**Explanation of Proprietary Information**

1. This information constitutes proprietary confidential business information because it contains BellSouth's trade secrets and information relating to BellSouth's competitive interests. Specifically, the subject information relates to BellSouth's marketing efforts and procedures. Disclosure of this data would cause competitive 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 contains customer confidential account information, which is prohibited from being disclosed under Section 364.24, Florida Statutes. Accordingly, this information is subject to protection under Section 364.183, Florida Statutes.

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030349-TP  
Request for Confidential Classification  
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09/12/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSE TO SUPRA'S 1<sup>ST</sup> REQUEST FOR PRODUCTION OF  
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REQUEST NO. 4 FILED AUGUST 26, 2003, AND  
REQUEST NO. 5 (LATE-FILED HEARING EXHIBIT NO. 7) FILED  
SEPTEMBER 5, 2003  
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**PRODUCTION OF DOCUMENT REQUEST NO. 1**

<u>Location</u>	<u>Reason</u>
Entire Document	1

**PRODUCTION OF DOCUMENT REQUEST NO. 4**

<u>Location</u>	<u>Reason</u>
Entire Document	1

**PRODUCTION OF DOCUMENT REQUEST NO. 5**

<u>Location</u>	<u>Reason</u>
Entire Document	2