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Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
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September 16, 2003

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: Docket No. 030137-TP (ITC^DeltaCom)

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its responses to Florida Public Service Commission Staff's 2nd Set of Interrogatories, Item Nos. 46, 68, and 87, 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,



E. Earl Edenfield, Jr. (en)

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

DOCUMENT ALREADY FILED
08804 SEP 16 8
FPSC-DC CLERK

CERTIFICATE OF SERVICE
Docket No. 030137-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 16th day of September, 2003 to the

following:

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Adam Teitzman
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of ITC^DeltaCom) Communications, Inc. with BellSouth) Telecommunications, Inc. pursuant to) the Telecommunications Act of 1996))	Docket No. 030137-TP Filed: September 16, 2003
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**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 26, 2003, BellSouth filed its response to Florida Public Service Commission Staff's ("Staff") Second Interrogatories (Item Nos. 35 through 98) in this docket. BellSouth's response to Interrogatory Nos. 68 and 87 as well as the attachment to BellSouth's response to Interrogatory No. 46 include confidential business information that is considered proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the attachment BellSouth provided to respond to Staff's Second Set of Interrogatories, Request No. 46 as well as responses to Interrogatory Nos. 68 and 87 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. The information discussed in Request for Specified Confidential Classification 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.

3. 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.

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

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

6. 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.

7. 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 16th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B White

NANCY B. WHITE

(KA)

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c/o Nancy Sims

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ATTACHMENT A

BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 2nd SET OF INTERROGATORIES, REQUEST NOS.
46, 68 AND 87 FILED AUGUST 26, 2003,
IN FLORIDA DOCKET NO. 030137-TP**

Explanation of Proprietary Information

1. This information constitutes proprietary confidential information pertaining to how BellSouth conducts business. Disclosure of this data would cause harm to BellSouth' business operations. 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 constitutes proprietary confidential business information because it contains BellSouth's information relating to BellSouth's competitive interests. 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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
RESPONSE TO STAFF'S 2nd SET OF INTERROGATORIES, ITEM NOS. 46, 68
AND 87 FILED AUGUST 26, 2003, IN FLORIDA
DOCKET NO. 030137-TP**

ATTACHMENT TO INTERROGATORY ITEM NO. 46

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

INTERROGATORY ITEM NO. 68

<u>Location</u>	<u>Reason</u>
1 st line in "Response" paragraph	2

INTERROGATORY ITEM NO. 87

<u>Location</u>	<u>Reason</u>
1 st and 2 nd lines in "Response" paragraph	2