

Meredith E. Mays
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September 19, 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. 030869-TL

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent and Motion for Temporary Protective Order to Request Specified Confidential Classification for Citizens' 1st Set of Interrogatories, Attachment to Item No. 20, and 1st Request for Production of Documents, Item Nos. 2-5, 7, 11, 15, and 19.

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,



Meredith E. Mays (KA)

Enclosure

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

DOCUMENT NUMBER-DATE

09020 SEP 19 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 030869-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, *Hand Delivery and/or U.S. Mail this 19th day of September, 2003 to the following:

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Meredith E. Mays C/M

(+) Protective Agreement
(*) Hand Delivery

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications,) Docket No. 030869-TL
Inc., to reduce its Network Access Charges)
Applicable to Intrastate Long Distance in a)
Revenue-Neutral Manner) Filed: September 19, 2003

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT
TO REQUEST CONFIDENTIAL CLASSIFICATION AND MOTION
FOR TEMPORARY PROTECTIVE ORDER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Notice of Intent to Request Confidential Classification and pursuant to rule 25-22.006(5)(c), Florida Administrative code, its Motion for Temporary Protective Order.

1. On September 18, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed and served its Responses to Citizens' First Set of Interrogatories and 1st Request for Production of Documents. Specifically, BellSouth served via overnight mail documents and CDs containing confidential information in response to Citizens' Production of Documents Item Nos. 2-5, 7, 11, 15, 18 and 19. BellSouth also served via overnight mail its confidential attachment to its response to Citizens' First Set of Interrogatories, No. 20. The foregoing attachment and the documents and CDs responsive to the specified requests for production contain proprietary confidential business information.

2. Because BellSouth's attachment to its Response to Citizens' First Set of Interrogatories Item No. 20 and its documents and CDs responsive to Citizens' First Requests for Production Nos. 2-5, 7, 11, 15, 18 and 19 contain proprietary confidential business information, BellSouth is 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 the documents 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.

MOTION FOR TEMPORARY PROTECTIVE ORDER

BellSouth's attachment to its Response to Citizens' First Set of Interrogatories Item No. 20 and its documents and CDs responsive to Citizens' First Requests for Production Nos. 2-5, 7, 11, 15, 18 and 19 contain proprietary confidential business information that should not be disclosed. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth respectfully requests that the Prehearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. These documents contain, among other things, information relating to competitive interests, confidential financial information, and other proprietary confidential business information pursuant to § 364.183(3), Florida Statutes. If Public Counsel subsequently notifies BellSouth that any of the proprietary documents are to be used in a proceeding before the Commission, BellSouth will, in accordance with Rule 25-22.006,

Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing each of the documents identified.

Respectfully submitted this 19th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE (KA)

c/o Nancy Sims

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