

Nancy B. White  
General Counsel - Florida

BellSouth Telecommunications, Inc.  
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September 30, 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


**Re: Docket No. 030869-TP: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification and Motion for Protective Order for the exhibits to the *Revised* Direct Testimony of Steve Bigelow filed on September 30, 2003, 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,

  
Nancy B. White (KA)

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

DOCUMENT NUMBER - DATE

09410 SEP 30 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 Federal Express this 30th day of September, 2003 to the following:

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Patricia Christensen, Staff Counsel  
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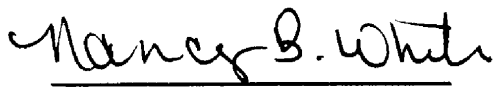
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AARP Witness

  
\_\_\_\_\_  
Nancy B. White (LWS)

**(+) Protective Agreement**  
**(\*) Hand Delivery**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by BellSouth Telecommunications, ) Docket No.: 030869-TL  
Inc., for Implementation of Section 364.164, )  
Florida Statutes ) Filed: September 30, 2003  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR PERMANENT PROTECTIVE ORDER**

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and files its Request for Confidential Classification and Motion for Permanent Protective Order for exhibits to the *Revised* testimony of Mr. Steve Bigelow filed in the above captioned docket on September 30, 2003.

1. BellSouth is filing its Request for Confidential Classification and Motion for Protective Order for these exhibits because BellSouth deems the information therein to be confidential and proprietary business information in that it reflects cost studies of various services. Since competitors who will offer such services can use this information as a resource, disclosure of this information would impair BellSouth's ability to compete.

2. BellSouth has appended to this Request for Confidential Classification as Attachment A a listing showing the location in the response of the information designated by BellSouth as confidential.

3. Appended hereto in an envelope designated as Attachment B is one copy of the information with the confidential information deleted.

4. Attached as Attachment C is a sealed envelope containing one copy of the information with the material which is confidential and proprietary. Copies of Attachment C are not being served on the other parties in this proceeding.

5. This information is entitled to proprietary confidential classification for the following reasons. The documents contain actual unit cost information for discrete cost elements. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to BellSouth. This information is valuable and is used by BellSouth in conducting its business. Section 364.183(e), Florida Statutes, expressly considers as proprietary confidential business information any information relating to competitive business of the provider. The information contained in these interrogatories, as more specifically described above, meets the statutory criteria, and should therefore be afforded confidential classification.

6. BellSouth is filing this Request for Confidential Classification and Motion for Permanent Protective Order so that the Commission Staff and the Office of Public Counsel may receive copies of the complete filing made by BellSouth in the above captioned docket.

7. BellSouth has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been generally disclosed.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above and contained in the exhibits of the *Revised* Direct Testimony of Steve Bigelow to be confidential proprietary business information, and thus not subject to public disclosure.

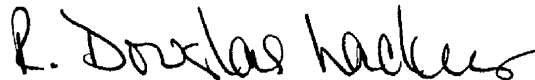
Respectfully submitted this 30th day of September, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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JAMES MEZA III  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
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(305) 347-5558



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R. DOUGLAS LACKEY (KA)  
675 W. Peachtree Street  
Suite 4300  
Atlanta, Georgia 30375  
(404) 335-0747

# 507179

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS TO THE  
REVISED DIRECT TESTIMONY OF STEVE BIGELOW FILED IN BELLSOUTH'S  
PETITION FOR IMPLEMENTATION OF SECTION 364.164, FLORIDA STATUTES.**

**Explanation of Proprietary Information**

1. This information reflects BellSouth's cost to provide certain services. The public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. BellSouth is not able to obtain its competitors' costs to provide service. Therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. For these reasons, the public disclosure of the information would impair the competitive business of BellSouth, and the information is, therefore, entitled to confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, 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.  
Request for Confidential Classification  
Page 2 of 2  
09/30/03

LOCATION

REASON

BIGELOW'S EXHIBITS

EXHIBIT SB1

Page 1 of 13 through 5 of 13, Column 10, 11, & 12	1
Page 6 of 13, Column 1, 2 and 3	1
Page 8 of 13 , column 10, 11, 12	1
Page 9 of 13, column 1, 2, and 3	1
Page 11 of 13, column 10, 11, 12	1
Page 12 of 13, column 1, 2, and 3	1

EXHIBIT SB2

Pages 1 of 13 – Page 5 of 13, Column 10, 11, & 12	1
Page 6 of 13, Column 1, 2, & 3	1
Page 8 of 13, Column 10, 11, & 12	1
Page 9 of 13, Column 1, 2, & 3	1
Page 11 of 13, Column 10, 11, 12	1
Page 12 of 13, Column 1, 2, 3	1

EXHIBIT SB3

Page 1 of 67 – Column 11, 12, & 13	1
Page 4 of 67 – Page 57 of 67, Column 10, 11 & 12	1
Page 61 of 67 – Page 62 of 67, Column 10, 11, & 12	1
Page 65 of 67 – Column 10, 11, & 12	1

EXHIBIT SB4

Page 1 – Column 11, 12, & 13	1
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