

Meredith E. Mays  
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BellSouth Telecommunications, Inc.  
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October 21, 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 Request for Specified Confidential Classification for OPC's Fourth Request for Production of Documents (No. 41), 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,

  
Meredith E. Mays

Enclosure

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

509362

DOCUMENT NUMBER-DATE

10337 OCT 21 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 Delivered\* and U.S. Mail this 21<sup>st</sup> day of October, 2003 to the following:

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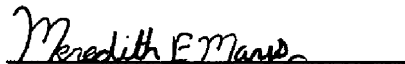
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AARP Witness

  
Meredith E. Mays (ES)

(+) Protective Agreement  
(\* ) Hand Delivered

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by BellSouth Telecommunications, )  
Inc., to reduce its Network Access Charges ) Docket No. 030869-TL  
Applicable to Intrastate Long Distance in a )  
Revenue-Neutral Manner ) Filed: October 21, 2003

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

BellSouth Telecommunications, Inc. ("BellSouth") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, this Request for Specified Confidential Classification and states the following:

1. On September 30, 2003, BellSouth Telecommunications, Inc. filed its Notice of Intent with respect to its Responses to Office of Public Counsel's (OPC) Fifth Set of Interrogatories (No. 61) and Fourth Request for Production of Documents (No. 41). BellSouth is now filing a Request for Confidential Classification of the BSTLM-Loop Model provided in response to Request for Production No. 41 of OPC's Fourth Request for Production of Documents because said document contains proprietary confidential business information. A more specific description of this information is contained in Attachment A.

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 contains three CD Roms that contain the proprietary version of the model.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 21<sup>st</sup> day of October, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (CB)

c/o Nancy Sims

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(305) 347-5558

*R. Douglas Lackey*

R. DOUGLAS LACKEY (CB)

MEREDITH E. MAYS

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## **ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030869-TL  
Request for Confidential Classification  
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10/21/03**

### **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO OPC'S 4<sup>th</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, POD NO. 41 FILED SEPTEMBER 29, 2003, IN FLORIDA DOCKET NO. 030869-TL**

#### **Explanation of Proprietary Information**

1. This information reflects vendor specific pricing negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and/or services on favorable terms. Pursuant to Section 364.183, Florida Statutes such information is classified as proprietary, confidential business information which is exempt from the Open Records Act.
2. 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, therefore, it would be inequitable and unfair for BellSouth's competitors to have access to BellSouth's cost information. In addition, this information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to 364.183, Florida Statutes and is exempt from the Open Records Act.

# ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030869-TL  
Request for Confidential Classification  
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10/21/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO OPC'S 4<sup>th</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, POD NO. 41 FILED  
SEPTEMBER 29, 2003, IN FLORIDA DOCKET NO. 030869-TL

## POD NO. 41 – Three CD Roms

<u>Location</u>	<u>Reason</u>
Entire CDs	1 and 2

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030869-TL  
Request for Confidential Classification  
Page 1 of 1  
10/21/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO OPC'S 4<sup>th</sup> REQUEST FOR PRODUCTION OF DOCUMENTS, POD NO. 41 FILED  
SEPTEMBER 29, 2003, IN FLORIDA DOCKET NO. 030869-TL**

**PROPRIETARY COPY  
(3 CD ROMS)**