

LISA FOSHEE  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0754

November 17, 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

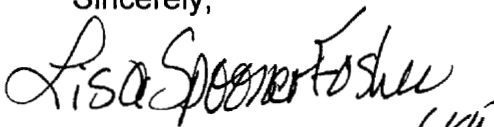
**Re: Docket No.: 030945-TP  
Complaint of DIECA Communications, Inc., d/b/a Covad Communications  
Company Against BellSouth Telecommunications, Inc. for Breach of the  
Parties' Interconnection Agreement and Unauthorized Discontinuance of  
Service to Customers, Request for Maintenance of the Status Quo, and  
Request for Expedited Relief**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its responses to Covad's First Set of Interrogatories (Nos. 8, 12, 15, 27 and 28) and First Request for Production of Documents (Nos. 2 and 4), 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,

  
Lisa Spooner Foshee (LH)

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

DOCUMENT NUMBER-DATE

11547 NOV 17 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 030945-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and Federal Express this 17th day of November, 2003 to the following:

Rosanne Gervasi  
Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6224  
Fax No. (850) 413-6250  
[rgervasi@psc.state.fl.us](mailto:rgervasi@psc.state.fl.us)

Charles Watkins  
Senior Counsel  
Covad Communications Co.  
1230 Peachtree Street, N.E., 19th Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3494  
Fax No. (404) 942-3495  
[gwatkins@covad.com](mailto:gwatkins@covad.com)

Vicki Gordon Kaufman  
McWhirter Reeves McGlothlin Davidson  
Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 222-2525  
Fax No. (850) 222-5606  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

  
Lisa Spooner Foshee  
Lisa Spooner Foshee (CA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of DIECA Communications, Inc., d/b/a )  
Covad Communications Company against BellSouth ) Dkt No. 030945-TP  
Telecommunications, Inc. for Breach of the Parties' )  
Interconnection Agreement and Unauthorized Discontinuance )  
Of Service to Customers, Request for Maintenance of ) Filed November 17, 2003  
Status Quo, and Request for Expedited Relief. )

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

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

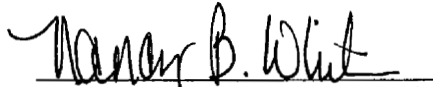
1. On October 27, 2003, BellSouth filed responses to DIECA Communications, Inc.'s (d/b/a Covad) First Set of Interrogatories and First Requests for Production of Documents. At that time BellSouth filed a Notice of Intent to Request Specified Confidential Classification. BellSouth's responses to Interrogatory Item Nos. 8, 12, 15, 27 and 28 contain confidential business information that is proprietary to BellSouth. In addition, BellSouth's Responses to Covad's 1<sup>st</sup> Request for Production of Documents, Item Nos. 2 and 4, include confidential business information that is proprietary to BellSouth.

2. Because this information is proprietary, BellSouth is now 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.

3. 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.

Respectfully submitted this 17<sup>th</sup> day of November, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
NANCY B. WHITE (GA)  
JAMES MEZA III  
c/o Nancy H. Sims  
150 South Monroe Street  
Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

LISA FOSHEE  
R. DOUGLAS LACKEY  
Suite 4300, BellSouth Center  
675 West Peachtree Street, N.E.  
Atlanta, GA 30375  
(404) 335-0754

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Dkt. No. 030945-TP  
Covad's 1<sup>st</sup> Interrogatories  
Request for Confidential Classification  
Page 1 of 2  
11/17/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO COVAD'S 1<sup>ST</sup> INTERROGATORIES, ITEM NOS. 8, 12, 15, 27 AND  
28; AND RESPONSES TO COVAD'S 1<sup>ST</sup> REQUESTS FOR  
PRODUCTION ITEM NOS. 2 AND 4  
FILED OCTOBER 27, 2003**

1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause 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 business information related to contractual data, the disclosure of which would impair the efforts of BellSouth to contract for goods or services on favorable terms. 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.
3. This information contains competitive business information. The subject information includes internal methods and procedures, job aids, and force sizing models. 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 Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Dkt. No. 030945-TP  
Covad's 1<sup>st</sup> Interrogatories  
Request for Confidential Classification  
Page 2 of 2  
11/17/03**

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28; AND RESPONSES TO COVAD'S 1<sup>ST</sup> REQUESTS FOR  
PRODUCTION ITEM NOS. 2 AND 4  
FILED OCTOBER 27, 2003**

**RESPONSE TO INTERROGATORY NO. 8**

<u>Location</u>	<u>Reason</u>
Response, 1 <sup>st</sup> line, number of customers	1

**RESPONSE TO INTERROGATORY NO. 12**

Response, 1 <sup>st</sup> line, number of FastAccess customers	1
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**RESPONSE TO INTERROGATORY NO. 15**

Response, lines 1-5, dollar amounts each line	2
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**ATTACHMENT TO INTERROGATORY NO. 27**

Entire document	3
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**RESPONSE TO INTERROGATORY NO. 28**

Response, lines 4-8, dollar amounts each line	3
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**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2**

Entire document	3
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**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4**

Entire document	3
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