

ORIGINAL

Legal Department

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November 17, 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

RECEIVED-FPSC
03 NOV 17 PM 4:24
COMMISSION
CLERK

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Responses to AT&T's First Request for Production of Documents Item Nos. 1, 7 and 8 and First Set of Interrogatories Item Nos. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b), 106, and 107 in the above referenced docket. Confidential copies were previously served.

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
(24)

Nancy B. White

Enclosure

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

513531

This confidentiality request was filed by or for a "telco" for DN 11561-03. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-ref. 10672-03)

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
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rec
cent
records

Request *Redacted*
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE
11559 NOV 17 8 11560 NOV 17 8
FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

Confidential
DOCUMENT NUMBER-DATE
11561 NOV 17 8
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and U.S. Mail® this 17th day of November 2003 to the following:

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Nancy White (24)

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via U.S. Mail

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: November 17, 2003
_____)

**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.

1. On October 27, 2003, BellSouth filed its response to AT&T Communications of the Southern States, LLC's ("AT&T") First Interrogatories and First Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to AT&T's First Interrogatories, Item Nos. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b), 106, and 107 as well as the documents produced in BellSouth's responses to AT&T's First Request for Production of Documents, Request Nos. 1, 7 and 8.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Response to AT&T's First Interrogatories and First Request for Production of Documents includes confidential business 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 the 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 redacted copies of the document 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 17th day of November, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White

NANCY B. WHITE

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(CA)

c/o Nancy Sims

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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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11/17/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO AT&T'S 1ST INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

Explanation of Proprietary Information

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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. Consequently, this information 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.
2. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network usage forecasts, network utilization data, network switch line growth/loss, and network trunk terminations. If this information were disclosed publicly, it could cause harm to BellSouth in its operations and would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
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.

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 1ST INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
FLORIDA DOCKET NO. 030851-TP

INTERROGATORY, ITEM NO. 21

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Res. Lines (3 rd column)	all pages (all nos.)	1
% of Total Res. Access Lines in CLLI (4 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 22

Local	all pages (all nos.)	1
Toll	all pages (all nos.)	1
Other	all pages (all nos.)	1
Total	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 56

Res (3 rd column)	all pages (all nos.)	1
Bus (4 th column)	all pages (all nos.)	1
CTX (5 th column)	all pages (all nos.)	1
PBX (6 th column)	all pages (all nos.)	1
Public (7 th column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 62

Number of Premises	1 (all nos.)	1
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INTERROGATORY, ITEM NO. 64

Trunk T1s Spare (2 nd column)	all pages (all nos.)	2
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 1st INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

INTERROGATORY, ITEM NO. 84

Location

<u>RESPONSE:</u>	<u>Reason</u>
Second line, sixth and seventh words	1

INTERROGATORY, ITEM NO. 85

RESPONSE:

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Physical Revenues	1 of 2 (all nos.)	1
Virtual Revenues	1 of 2 (all nos.)	1

<u>Row Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
2002 (line 1)	2 of 2 (all nos.)	1

INTERROGATORY, ITEM NO. 105 (a)

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
2003 (3 rd column)	all pages (all nos.)	2
2004 (4 th column)	all pages (all nos.)	2
2005 (5 th column)	all pages (all nos.)	2
2006 (6 th column)	all pages (all nos.)	2
2007 (7 th column)	all pages (all nos.)	2

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 1ST INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

INTERROGATORY, ITEM NO. 105 (b)

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Analog NALS	all pages (all nos.)	2
TR-008 IDLC	all pages (all nos.)	2
GR303 IDLC	all pages (all nos.)	2
ISDN BRI	all pages (all nos.)	2
Trunk T1s	all pages (all nos.)	2
PRI	all pages (all nos.)	2

INTERROGATORY, ITEM NO. 106

1/1/2003 (2 nd column)	all pages (all nos.)	2
9/1/2003 (3 rd column)	all pages (all nos.)	2
Growth/Loss (4 th column)	all pages (all nos.)	2

INTERROGATORY, ITEM NO. 107

<u>RESPONSE:</u>	<u>Page Number</u>	<u>Reason</u>
a) UNE loops	1 (number)	1
b) UNE-P	1 (number)	1
c) Resale	1 (number)	1

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 1st INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
FLORIDA DOCKET NO. 030851-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 1

Entire Document 3

PRODUCTION OF DOCUMENT REQUEST NO. 7

Entire Document 3

PRODUCTION OF DOCUMENT REQUEST NO. 8

Location

<u>Page Labeled</u>	<u>Reason</u>
N&CS Forecasting Process (entire page)	3
Local Centers; Force & Capacity Planning (entire page)	3

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
LCSC SR Ordering	1 of 4 (all nos.)	3
Actuals (all columns so labeled)	2 of 4 (all nos.)	3
Actuals (all columns so labeled)	3 of 4 (all nos.)	3
Projected (all columns so labeled)	3 of 4 (all nos.)	3
Projected (all columns so labeled)	4 of 4 (all nos.)	3
Average 2004	4 of 4 (all nos.)	3

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 106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST
 NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN
 FLORIDA DOCKET NO. 030851-TP**

PRODUCTION OF DOCUMENT REQUEST NO. 8 (cont.)

Location

<u>Column Labeled</u>	<u>Row Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
A	+ UNE maintenance	1 of 11	3
A	+ Resale Maintenance	1 of 11	3
A	+ UNE Provisioning	1 of 11	3
A	Total CWINS Modeled WS32 Force	1 of 11	3
C= A-B	+ UNE maintenance	1 of 11	3
C= A-B	+ Resale Maintenance	1 of 11	3
C= A-B	+ UNE Provisioning	1 of 11	3
C= A-B	Total CWINS Modeled WS32 Force	1 of 11	3

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
B=D+E	1 of 11 (all nos.)	3
D	1 of 11 (all nos.)	3
E	1 of 11 (all nos.)	3
Jan – Jun (all columns so labeled)	2 of 11 (all nos.)	3
Average (all columns so labeled)	2 of 11 (all nos.)	3
Jul-Aug (all columns so labeled)	2 of 11 (all nos.)	3
Actuals (all columns so labeled)	3 of 11 (all nos.)	3
Actuals (all columns so labeled)	4 of 11 (all nos.)	3
Projected (all columns so labeled)	4 of 11 (all nos.)	3
Projected (all columns so labeled)	5 of 11 (all nos.)	3
Average 2004	5 of 11 (no.)	3
Actuals (all columns so labeled)	6 of 11 (all nos.)	3
Actuals (all columns so labeled)	7 of 11 (all nos.)	3

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO AT&T'S 1ST INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),
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PRODUCTION OF DOCUMENT REQUEST NO. 8 (cont.)

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Projected (all columns so labeled)	7 of 11 (all nos.)	3
Projected (all columns so labeled)	8 of 11 (all nos.)	3
Average 2004	8 of 11 (no.)	3
Actuals (all columns so labeled)	9 of 11 (all nos.)	3
Actuals (all columns so labeled)	10 of 11 (all nos.)	3
Projected (all columns so labeled)	10 of 11 (all nos.)	3
Projected (all columns so labeled)	11 of 11 (all nos.)	3
Average 2004	11 of 11 (no.)	3