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November 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-TP**: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner

Docket No. 030867-TP: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes

Docket No. 030868-TP: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes

Docket No. 030961-TP: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for the Office of Public Counsel's Direct Testimony of Dr. David J. Gabel, work papers, and exhibits; and AARP's Direct Testimony of Dr. N. Cooper and exhibits, 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 (MEM)

Enclosure

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

514460

This confidentiality request was filed by or for a "teleo" for DN ~~11890-03~~. 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.

DOCUMENT NUMBER-DATE

11889 NOV 21 8

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket Nos. 030867-TP, 030868, 030869-TL and 030961-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 21st day of November, 2003 to the following:

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Meredith Mays (LA)

(+) Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes) Docket No. 030961-TP))))
<hr/> In re: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes) Docket No. 030867-TL))))
<hr/> In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes) Docket No. 030868-TL))))
<hr/> In re: Petition by BellSouth Telecommunications, Inc., To Reduce Its Network Access Charges Applicable To Intrastate Long Distance in A Revenue-Neutral Manner) Docket No. 030869-TL)))) Filed: November 21, 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 this Request for Specified Confidential Classification.

1. On October 31, 2003, The Office of Public Counsel (OPC) filed with the Florida Public Service Commission ("FPSC") the direct testimony, work papers, and Exhibits of Dr. David J. Gabel, and on October 31, 2003, AARP filed direct testimony and Exhibits of Dr. Mark N. Cooper. Said testimony, work papers, and Exhibits contain information which OPC and AARP understood contained BellSouth proprietary and confidential information. On October 31, 2003, OPC filed a letter claiming confidentiality for portions of the testimony.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the direct testimony, work papers, and Exhibits of Dr. David J. Gabel, and direct testimony and Exhibits of Dr. Mark N. Cooper include confidential business cost 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 Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as confidential, proprietary business 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.

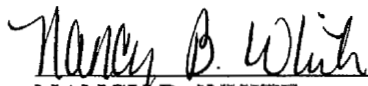
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

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.

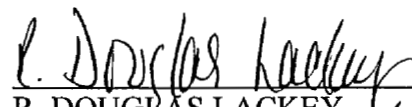
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 21st day of November 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

**BellSouth Telecommunications, Inc.
Request for Confidential Classification**

Page 1 of 3

11/19/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE TESTIMONY AND
PROPRIETARY WORKPAPER OF THE OFFICE OF PUBLIC COUNSEL WITNESS
DR. DAVID J. GABEL AND EXHIBITS MCN-1 AND MCN-2 FOR AARP'S WITNESS
DR. MARK N. COOPER IN FPSC DOCKETS 030867-TL, 030868-TL, 030869-TL FILED
ON OCTOBER 31, 2003.**

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.

LOCATION

REASON

TESTIMONY OF DR. DAVID J. GABEL (OPC)

Page 25, Lines 18 & 19	1
Page 26, lines 2, 3, 5, 6, & 7	1
Page 28, Lines 3,4,12,14, & 18	1
Page 29, Line 1	1
Page 86, Lines 1 & 3	1
Page 87, Lines 13 & 14	1
Page 89, Lines 7 & 8	1
Page 90, Lines 10, 11, 13, 14 & 21	1
Page 91, Lines 3, 5, 8, 9, 11, & 12	1

DR. DAVID J. GABEL'S WORKPAPERS (OPC)

Appj_Prop.xls	1
B out_prop.xls	1
Bnocom_prop.xls	1
LCOM-prop.xls	1
OSPFac-prop.xls	1
R out_prop.xls	1
Retail_prop.xls	1
Rnocom-prop.xls	1
Work book common cost.prop.xls	1

EXHIBITS OF DR. MARK N. COOPER (AARP)

EXHIBIT MNC-1	
Page 1, Line 1, Column B, C, & D	1
Page 2, Lines 1-5, Column A	1
EXHIBIT MNC-2	
Line 1, Columns A, B, & C	1