

Meredith E. Mays
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December 9, 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

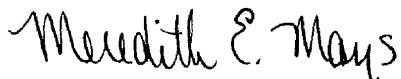
Docket No. 030961-TP: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its proprietary Response to Staff's Late-filed deposition request, 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 (KA)

Enclosure

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

517018

DOCUMENT NUMBER-DATE

12695 DEC 10 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, Hand Delivery* and FedEx this 9th day of December, 2003 to the following:

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Meredith Mays (VA)

(+) Protective Agreement
(*) Hand Delivered

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: December 9, 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 December 2, 2003, BellSouth Telecommunications, Inc. ("BellSouth") served its response to Staff's Late-filed deposition request for "Mileage for Common Transport" made during the November 25, 2003, deposition of W. Bernard Shell. This Late-Filed Exhibit contains information that is confidential and proprietary to BellSouth. In addition, on December 2, 2003, BellSouth filed a Notice of Intent to Request Specified Confidential Classification and a Motion

for Temporary Protective Order with respect to the Late-filed Deposition Exhibit of W. Bernard Shell.

2. 2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the Late-Filed Deposition Exhibit of W. Bernard Shell includes 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 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 9th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

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

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12/9/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S LATE-FILED DEPOSITION REQUEST OF W. BERNARD SHELL
DURING STAFF'S DEPOSITION TAKEN ON NOVEMBER 25, 2003 IN FPSC
DOCKETS 030867-TL, 030868-TL, 030869, AND 030961-TI**

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. 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.

LOCATION

REASON

Response Line 1

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