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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 rebuttal testimony of Steve Bigelow, John Ruscilli and W. Bernard Shell Exhibit WSB-1, 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

517017

DOCUMENT NUMBER-DATE

12698 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 9<sup>th</sup> day of December, 2003 to the following:

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*Meredith Mays*  
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Meredith Mays (KA)

**(+) Protective Agreement**  
**(\*) Hand Delivered**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|   |  |
|---|--|
| In re: Flow-through of LEC Switched Access<br>Reductions by IXCs, Pursuant to Section 364.163(2),<br>Florida Statutes   | ) Docket No. 030961-TP<br>)<br>)<br>)<br>)                         |
| In re: Petition by Verizon Florida, Inc. to reform<br>intrastate network access and basic local<br>telecommunications rates in accordance with Section<br>364.164, Florida Statutes                         | ) Docket No. 030867-TL<br>)<br>)<br>)<br>)                         |
| In re: Petition by Sprint-Florida, Incorporated to<br>reduce intrastate switched network access rates to<br>interstate parity in revenue-neutral manner pursuant<br>to Section 364.164(1), Florida Statutes | ) Docket No. 030868-TL<br>)<br>)<br>)<br>)                         |
| In re: Petition by BellSouth Telecommunications,<br>Inc., To Reduce Its Network Access Charges<br>Applicable To Intrastate Long Distance in A<br>Revenue-Neutral Manner                                     | ) Docket No. 030869-TL<br>)<br>)<br>)<br>) 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 November 19, 2003, BellSouth Telecommunications, Inc. ("BellSouth") filed with the Florida Public Service Commission ("FPSC") the rebuttal testimony of Steve Bigelow, John Ruscilli and Exhibit WSB-1 of the rebuttal testimony of W. Bernard Shell. Said testimony and Exhibit contain information that is confidential and proprietary to BellSouth. In addition, on November 19, 2003, BellSouth filed a Notice of Intent to Request Specified Confidential

Classification and a Motion for Temporary Protective Order with respect to the rebuttal testimony of Steve Bigelow and John Ruscilli and the Exhibit WSB-1 of the rebuttal testimony of W. Bernard Shell.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the Rebuttal testimony of Steve Bigelow and John Ruscilli and Exhibit WSB-1 of the rebuttal testimony of W. Bernard Shell's include confidential business information and confidential proprietary 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.

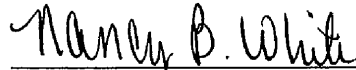
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

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.

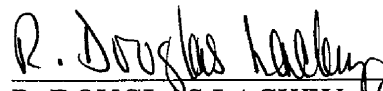
WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 9<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF THE REBUTTAL  
TESTIMONY OF STEVE BIGELOW, JOHN A. RUSCILLI, AND FOR EXHIBIT WBS-1  
OF W. BERNARD SHELL'S REBUTTAL TESTIMONY FILED IN FPSC DOCKETS  
030867-TL, 030868-TL, 030869-TL, AND 030961-TI ON NOVEMBER 19, 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.
2. This information reflects BellSouth's market strategy relating to its competitive marketing position. Specifically, this information discusses, describes and evaluates BellSouth's potential strategic responses to various competitive scenarios; BellSouth's competitors can use this information to develop their own market strategy with which to thwart BellSouth's effort in this market. Thus, the disclosure of this information to BellSouth's competitors would impair BellSouth's ability to compete and is entitled to confidential classification pursuant to Section 364.183(3)(a) and (3)(e), Florida Statutes. In addition, this information is valuable as it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information is a trade secret which should be classified as proprietary, confidential business information exempt from the Open Records Act.



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Request for Confidential Classification  
Page 2 of 3  
12/9/03**

**LOCATION**

**REASON**

**BIGELOW'S TESTIMONY**

|                         |      |
|-------------------------|------|
| Page 2, Lines 14, 15    | 1, 2 |
| Page 3, Lines 4, 6, & 7 | 1, 2 |

**RUSCILLI'S TESTIMONY**

|                        |      |
|------------------------|------|
| Page 10, Lines 14 & 16 | 1, 2 |
|------------------------|------|

**EXHIBIT WBS-1**

|                               |   |
|-------------------------------|---|
| Lines 1-13, Columns D, E, & F | 1 |
|-------------------------------|---|