Meredith E. Mays Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0750

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: <u>Docket No. 030869-TP</u>: Petition by BellSouth Telecommunications, Inc. to Reduce its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner

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

<u>Docket No. 030868-TP</u>: 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

<u>Docket No. 030961-TP</u>: 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 Responses to Staff's Third Set of Interrogatories, 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, Neredit E. Mays Meredith E. Mays

Enclosure cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White 517022

DOCUMENT NUMBER DATE 12710 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:

Beth Keating, Staff Counsel\* Felicia Banks, Staff Counsel Patricia Christensen, Staff Counsel Lee Fordham, Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Phone: (850) 413-6212 Fax: (850) 413-6212 Fax: (850) 413-6250 bkeating@psc.state.fl.us fbanks@psc.state.fl.us pchriste@psc.state.fl.us

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Maney B. Whit Nancy B. White ((4)

(+) 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-TL )
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 ) )
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 ) ) )
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 its Request

for Specified Confidential Classification.

1. On November 20, 2003, BellSouth filed its response to Florida Public Service

Commission Staff's (Staff's) Third Set of Interrogatories in this docket. Information provided

in BellSouth's responses is considered proprietary, confidential business information and should

not be disclosed.

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 Staff's

Third Set of Interrogatories 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.

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

BELLSOUTH TELECOMMUNICATIONS, INC. NANCY B. WHITE ( (A) c/o Nancy Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5558 R. DOUGLAS LACKEY (A) MEREDITH E. MAYS Suite 4300 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0747 (404) 335-0750

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#### ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 030867-TL, 030868-TL 030869-TL and 030961-TL Request for Confidential Classification Page 1 of 2 12/9/03

### REQUEST FOR CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S 3<sup>rd</sup> INTERROGATORIES, ITEM NOS. 56, 64, 65 AND ATTACHMENT TO ITEM NO. 57 FILED NOVEMBER 20, 2003 IN FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL

#### **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 for specific 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. This information contains proprietary, confidential business information. Specifically, it contains data pertaining to BellSouth's cost to provide certain services, disclosure of which would put BellSouth at a competitive disadvantage

ATTACHMENT A BellSouth Telecommunications, Inc. FPSC Docket No. 030867-TL, 030868-TL 030869-TL and 030961-TL Request for Confidential Classification Page 2 of 2 12/9/03

# REQUEST FOR CLASSIFICATION OF BELLSOUTH'S RESPONSE TO STAFF'S 3<sup>rd</sup> INTERROGATORIES, ITEM NOS. 56, 57 (ATTACHMENT) 64, AND 65 FILED NOVEMBER 20, 2003 IN FLORIDA DKT. NOS. 030867-TL, 030868-TL, 030869 AND 030961-TL

## **INTERROGATORY, ITEM NO. 56**

Location	Reason
Response - all dollar amounts	1
<b>INTERROGATORY ITEM NO. 57 ATTACHMENT</b>	
Entire Document	2
INTERROGATORY ITEM NO. 64	
Response - all dollar amounts	1
INTERROGATORY ITEM NO. 65	
Response - all dollar amounts	1