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General Counsel-Florida

BellSouth Telecommunications, Inc.  
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December 11, 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-TPSC  
03 DEC 11 PM 4:43  
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 Supplemental Response to MCI's First Set of Interrogatories (Nos. 1-195) and First Request for Production of Documents (No. 1), in the above referenced 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,

*Nancy B. White*

Nancy B. White (KA)

Enclosure

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

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

516655

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC
- OTH \_\_\_\_\_

*conf records*

This confidentiality request was filed by or for a "telco" for DN 12906-03. 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. 11785-03)  
See 12457-03*

DOCUMENT NUMBER-DATE

12905 DEC 11 03

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 FedEx® this 11<sup>th</sup> day of December 2003 to the following:

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Nancy B. White (KA)

**(+ )signed Protective Agreement**  
**(\*) via Hand Delivery**  
**(⊗) via FedEx**

**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: December 11, 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 MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (hereinafter "MCI") First Set of Interrogatories (Nos. 1-195) and First Request for Production of Documents (No. 1), dated October 31, 2003.

In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to MCI's First Set of Interrogatories, Attachments to Item Nos. 121 and 167, and First Request for Production, No. 1 responsive to interrogatory nos. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 105, 108, 109, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 and 194. BellSouth hereby withdraws from POD No. 1, Item Nos. 105, 108 and 109 from the original Notice of Intent. Upon review, these documents were deemed not to be proprietary.

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 MCI's First 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 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 11<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (10A)

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 6  
12/11/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 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/or 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.



ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/11/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**INTERROGATORY, ITEM NO. 121-ATTACHMENT**

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Dec 2002 Column		1
Aug 2003		1

**INTERROGATORY, ITEM NO. 167-ATTACHMENT**

Line UNE loops		1
Line UNE-P		1
Line Resale		1

**POD No. 1, INTERROGATORY NO. 33**

Entire Document	all pages (BST000034- BST000419)	3
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**POD No. 1, INTERROGATORY NO. 36**

Entire Document	all pages (BST000420- BST000528)	3
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**POD No. 1, INTERROGATORY NO. 40**

Entire Document	all pages (BST000534- BST000572)	3
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/11/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
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122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 51**

Total Volume Line	BST000574-	1
	BST000575	
Monthly Fallout Rate Line	BST000576-	
	BST000577	

**POD No. 1, INTERROGATORY NO. 52**

Total Volume Line	BST000579-	1
	BST000580	
Monthly Fallout Rate Line	BST000581-	
	BST000582	

**POD No. 1, INTERROGATORY NO. 59**

Entire Document	all pages	3
	BST000592-	
	BST000596	

**POD No. 1, INTERROGATORY NO. 78**

Entire Document	all pages	3
	BST000605-	
	BST000616	

**POD No. 1, INTERROGATORY NO. 82**

Entire Document	all pages	3
	BST000617-	
	BST000622	

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/11/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST  
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FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 97**

EQPT Column	BST000624-	2
	BST000630	
EQPT Column	BST000631-	
(f) and (g) Column	BST000635	
(h) and (i) Column	BST000636-	2
	BST000638	
Entire Page	BST000669-	2
	BST000732	

**POD No. 1, INTERROGATORY NO. 101**

Entire Document	BST000733-	2
	BST000734	

**POD No. 1, INTERROGATORY NO. 118**

Res Lines Column	BST000887-	1
% of Total Res Column	BST000901	
Res Column, Bus Column, CTX Column, PBX Column, Public Column	BST000902-	1
	BST000906	
All numbers in Table	BST000907-	1
	BST000912	

**POD No. 1, INTERROGATORY NO. 119**

All numbers in last three columns	BST000914	1
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
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12/11/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 122**

Last four Columns	BST000916- BST000935	1
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**POD No. 1, INTERROGATORY NO. 123**

Last four columns	BST000937- BST001051	2
Last two columns	BST001052- BST001055	2

**POD No. 1, INTERROGATORY NO. 124**

Entire Document	BST001056- BST001359	3
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**POD No. 1, INTERROGATORY NO. 126**

Entire Document	BST001360- BST001510	3
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**POD No. 1, INTERROGATORY NO. 159**

Eqpt Column, y/b 2004 Column, y/b 2005 Column y/b 2006 Column, y/b 2007 Column, y/b 2008 Col	BST001512- BST001516	2
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/11/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 160**

Entire Document	BST001517- BST001522	2
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**POD No. 1, INTERROGATORY NO. 161**

Last five columns	BST001524- BST001528	2
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**POD No. 1, INTERROGATORY NO. 165**

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**POD No. 1, INTERROGATORY NO. 166**

Last six columns	BST001535- BST001538	1
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**POD No. 1, INTERROGATORY NO. 194**

Last five columns	BST001540- BST001544	2
Last six columns	BST001545- BST001549	2