

ORIGINAL

Legal Department

Nancy B. White  
General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
305 347-5558

December 12, 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-FPSC  
03 DEC 12 PM 4:46  
COMMISSION  
CLERK

Re: Docket No. 030851-TP

Dear Ms. Bayó:


Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Notice of Intent to Request Specified Confidential Classification for its Responses to Staff's First Request for Production of Documents, Item Nos. 1, 9 and 10, 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.

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

Sincerely,

  
Nancy B. White (KA)

Enclosure

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

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

517228

conf records

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 12968-03. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE  
12967 DEC 12 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 12<sup>th</sup> day of December 2003 to the following:

Adam Teitzman, Staff Counsel\*  
Jason Rojas, Staff Counsel  
Jeremy Susac, Staff Counsel  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[jrojas@psc.state.fl.us](mailto:jrojas@psc.state.fl.us)  
[jsusac@psc.state.fl.us](mailto:jsusac@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Joseph A. McGlothlin + ⊗  
Vicki Gordon Kaufman~ +  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
Represents FCCA  
Represents Covad ~  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)

Charles E. Watkins +  
Covad Communications Company  
1230 Peachtree Street, N.E.  
19<sup>th</sup> Floor  
Atlanta, Georgia 30309  
Tel. No. (404) 942-3492  
Fax. No. (404) 942-3495  
[gwatkins@covad.com](mailto:gwatkins@covad.com)  
[ibell@covad.com](mailto:ibell@covad.com)

Nanette Edwards, Esq. +  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Floyd Self, Esq. +  
Norman H. Horton, Esq. ~  
Messer Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom,  
Represents KMC  
Represents MCI  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

De O'Roark, Esq. +  
MCI WorldCom Communications, Inc.  
6 Concourse Parkway, Suite 3200  
Atlanta, GA 30328  
[de.oroark@mci.com](mailto:de.oroark@mci.com)

Jon Moyle, Jr.  
Moyle Law Firm (Tall)  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: 681-8788  
Email: [jmoylejr@moylelaw.com](mailto:jmoylejr@moylelaw.com)

Andrew O. Isar  
Miller Isar, Inc.  
7901 Skansie Avenue  
Suite 240  
Gig Harbor, WA 98335  
Tel. No. (253) 851-6700  
Fax No. (253) 851-6474  
[aisar@millerisar.com](mailto:aisar@millerisar.com)

Jason Spinard, Esq.  
Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA 02169  
Tel. No. 617 847-1500  
Fax No. 617 847-0931  
[jspinard@granitenet.com](mailto:jspinard@granitenet.com)  
[rcurrier@granitenet.com](mailto:rcurrier@granitenet.com)  
[gcookman@granitenet.com](mailto:gcookman@granitenet.com)

Donna McNulty, Esq. +ⓧ  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd., Suite 201  
Tallahassee, FL 32301-2960  
[donna.mcnulty@mci.com](mailto:donna.mcnulty@mci.com)

Tracy Hatch, Esq.  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6360  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper +  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Jake E. Jennings +  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No. 864 672-5877  
Fax No. 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30034-8119  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

Susan S. Masterton, Esq. +  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Jeffrey J. Binder  
Allegiance Telecom of Florida, Inc.  
1919 M Street, N.W.  
Washington, DC 20037  
Tel. No (202) 464-1792  
[Jeff.binder@alqx.com](mailto:Jeff.binder@alqx.com)

Terry Larkin  
Allegiance Telecom, Inc.  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: (630) 522-6453  
[terry.larkin@alqx.com](mailto:terry.larkin@alqx.com)

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
[jean.houck@btitelecom.net](mailto:jean.houck@btitelecom.net)

Jonathan Audu  
Manager, Regulatory Affairs  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
[jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

Margaret Ring, Director  
Regulatory Affairs  
Network Telephone Corporation  
815 S. Palafox St.  
Pensacola, FL 32501  
850-465-1748  
[Margaret.Ring@networktelephone.net](mailto:Margaret.Ring@networktelephone.net)

Tier 3 Communications  
Kim Brown  
2235 First Street, Suite 217  
Ft. Myers, FL 33901-2981  
Phone: (239) 689-0000  
Fax: (239) 689-0001  
Email: [steve@tier3communications.net](mailto:steve@tier3communications.net)

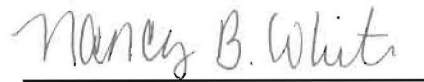
Jorge Cruz-Bustillo +  
Assistant General Counsel  
Supra Telecommunications & Information  
Systems, Inc.  
2620 S.W. 27th Avenue  
Miami, FL 33133  
Phone: (305) 476-4252  
Fax: (305) 443-1078  
[jorge.cruz-bustillo@stis.com](mailto:jorge.cruz-bustillo@stis.com)

**AT&T by E-Mail only: +**  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Richard Chapkis/Kimberly Caswell  
Verizon Florida Inc.  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110  
Phone: (813) 483-1256  
Fax: (813) 273-9825  
Email: [richard.chapkis@verizon.com](mailto:richard.chapkis@verizon.com)

Matthew Feil (+)  
Scott Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801-1640  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

Thomas M. Koutsky  
Vice President, Law and Public Policy  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street, N.W., Ste. 500  
Washington, D.C. 20036  
Tel. No. (202) 955-9653  
[tkoutsky@z-tel.com](mailto:tkoutsky@z-tel.com)

  
\_\_\_\_\_  
Nancy B. White (UA)

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

ORIGINAL

**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 12, 2003  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF  
INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On December 12, 2003, BellSouth Telecommunications, Inc. filed its Responses to Florida Public Commission Staff's (hereinafter "Staff") First Interrogatories and First Request for Production of Documents in the above-referenced docket. In response to Staff's First Request for Production of Documents, Item Nos. 1, 9 and 10. BellSouth has produced documents that contain confidential business information and BellSouth methods and procedures that are considered proprietary. BellSouth has produced this information to Staff consistent with the terms of the protective agreement between the parties.

2. Because this information contains proprietary information, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of these responses without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all

DOCUMENT NUMBER DATE

12967 DEC 12 03

FPSC-COMMISSION CLERK

parties of record. BellSouth will be filing a Request for Confidential Classification within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 12<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (CA)  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

*R. Douglas Lackey*

R. DOUGLAS LACKEY (CA)  
ANDREW D. SHORE  
MEREDITH E. MAYS  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0750