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General Counsel-Florida

BellSouth Telecommunications, Inc.  
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December 22, 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 22 PM 4: 39  
COMMISSION  
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Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Responses to Florida Competitive Carriers Associations (FCCA)'s Second Set of Interrogatories Item No. 24 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

*J*  
FPSC-BUREAU OF RECORDS

Sincerely,

*Nancy B. White MFS*

Nancy B. White

Enclosure

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

519349

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 1333303. 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. 12171-03)*

DOCUMENT NUMBER-DATE

13332 DEC 22 03

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**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 22<sup>nd</sup> day of December 2003 to the following:

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Nancy B. White

**(+ )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 22, 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 December 1, 2003, BellSouth filed its response to the Florida Competitive Carriers Association (FCCA)'s Second Set of Interrogatories (Nos. 19-25), dated November 10, 2003.

In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to FCCA's Second Set of Interrogatories, No. 24.

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 FCCA's Second 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 and

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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 22<sup>nd</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
NANCY B. WHITE

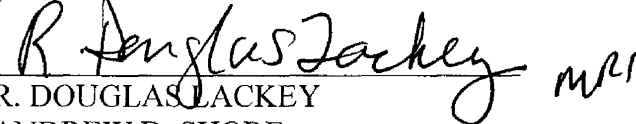
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
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 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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**INTERROGATORY, ITEM NO. 2-2**

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Jul 2003 Line	In response	1
Aug 2003 Line	In response	1
Sept 2003 Line	In response	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

REQUEST: For the most recent quarter for which the information is available, provide the:

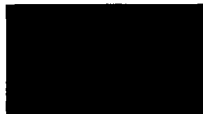
- a. Total number of UNE-P lines in Florida;
- b. Total billed revenues for unbundled local switching, shared transport and any charges for call detail records/access records billed UNE-P carriers in Florida.

RESPONSE: a. As of September 30, 2003, there were 617,494 UNE-P lines in Florida.

- b. This information is proprietary and is being provided subject to the terms of the non-disclosure agreement in this proceeding.

Total billed revenue for unbundled local switching and shared transport:

Jul 2003  
Aug 20003  
Sept 2003



BellSouth does not have its revenue information broken down to the detail needed to exclude call detail records/access records from other revenues.

RESPONSE PROVIDED BY: Craig Williard  
David H. Wood

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**ONE HIGHLIGHTED COPY**