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December 31, 2003

Mrs. Blanca S. Bayó  
Director  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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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 Supplemental Responses to MCI's First Set of Interrogatories (Nos. 1-195) and First Request for Production of Documents (No. 1), responsive attachments to Interrogatories Nos. 6 and 98, 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,

*Nancy B. White*  
Nancy B. White (KA)

RECEIVED & FILED

*Jh*  
FPSC-BUREAU OF RECORDS

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

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This confidentiality request was filed by or for a "telco" for DN 12966-03. 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.

*(See DNs 11785-03; 12457-03; 12906-03; 13331-03)*

DOCUMENT NUMBER

**13616 DEC 31 3**

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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 31st day of December 2003 to the following:

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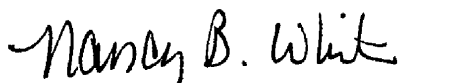
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**(+ )signed Protective Agreement**  
**(\*) via Hand Delivery**  
**(⊗) via FedEx**

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 31, 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 12, 2003, BellSouth filed its supplemental 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 attachments for interrogatories nos. 6 and 98 that were provided in BellSouth's Supplemental Responses to MCI's First Request for Production, No. 1.

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 Supplemental Response to MCI's First Request for Production No. 1 includes confidential business information utilized by BellSouth in the conduct of its 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

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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 a statement that these documents were served on CD-ROM with no public disclosure.

5. Attachment C to BellSouth's Request for Confidential Classification indicates that the documents were provided on CD-ROM with notice of intent.

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 31<sup>st</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 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.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**CD-ROM CONTAINING POD NO. 1, INTERROGATORY NO. 6**

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**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**DOCUMENTS PROVIDED ON CD-ROM - NO PUBLIC DISCLOSURE**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/31/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**DOCUMENTS PROVIDED ON CD-ROM WITH NOTICE OF INTENT**