

ORIGINAL

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December 31, 2003

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CLERK

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

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 Responses to Staff's First Request for Production of Documents (Nos. 1, 9 and 10), 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,

RECEIVED & FILED

*Sh*

FPSC-BUREAU OF RECORDS

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

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1 \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
OTH 1 conf \_\_\_\_\_

records

This confidentiality request was filed by or for a "telco" for DN 13620-03. 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.

Cx-ref. 12968-03

DOCUMENT NUMBER-DATE

13619 DEC 31 8

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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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Nancy B. White (VA)

**(+ )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 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 response to Florida Public Commission Staff's (hereinafter "Staff") First Interrogatories and First Request for Production of Documents. In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Responses to Staff's First Request for Production of Documents, Item Nos. 1, 9 and 10.

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 First Request for Production of Documents 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 pursuant to

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

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information contains competitive business information. The subject information includes internal methods and procedures 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.
2. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network utilization data.. 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).

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 1**

<u>Location</u>	<u>Reason</u>
All pages – all number	1

**PRODUCTION OF DOCUMENT REQUEST NO. 9**

<u>Location</u>	<u>Reason</u>
<u>Pages Labeled</u>	
Worst Case Force Projection, - All pages - all numbers	1

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
 TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
 REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
 FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>	<u>Reason</u>
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Page Labeled

N&CS Forecasting Process (entire page)	1
Local Centers; Force & Capacity Planning (entire page)	1

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
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LCSC SR Ordering	1 of 4 (all nos.)	1
Actuals (all columns so labeled)	2 of 4 (all nos.)	1
Actuals (all columns so labeled)	3 of 4 (all nos.)	1
Projected (all columns so labeled)	3 of 4 (all nos.)	1
Projected (all columns so labeled)	4 of 4 (all nos.)	1
Average 2004	4 of 4 (all nos.)	1

Location

<u>Column Labeled</u>	<u>Row Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
A	+ UNE maintenance	1 of 11	1
A	+ Resale Maintenance	1 of 11	1
A	+ UNE Provisioning	1 of 11	1
A	Total CWINS Modeled WS32 Force	1 of 11	1
C= A-B	+ UNE maintenance	1 of 11	1
C= A-B	+ Resale Maintenance	1 of 11	1
C= A-B	+ UNE Provisioning	1 of 11	1
C= A-B	Total CWINS Modeled WS32 Force	1 of 11	1

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
 TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
 REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
 FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	<u>Reason</u>
B=D+E	1
D	1
E	1
Jan – Jun (all columns so labeled)	1
Average (all columns so labeled)	1
Jul-Aug (all columns so labeled)	1
Actuals (all columns so labeled)	1
Actuals (all columns so labeled)	1
Projected (all columns so labeled)	1
Projected (all columns so labeled)	1
Average 2004	1
Actuals (all columns so labeled)	1
Actuals (all columns so labeled)	1
<u>Location</u>	
<u>Column Labeled</u>	<u>Page Numbers</u>
Projected (all columns so labeled)	7 of 11 ( all nos.)
Projected (all columns so labeled)	8 of 11 ( all nos.)
Average 2004	8 of 11 (no.)
Actuals (all columns so labeled)	9 of 11 ( all nos.)
Actuals (all columns so labeled)	10 of 11 ( all nos.)
Projected (all columns so labeled)	10 of 11 ( all nos.)

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>		<u>Reason</u>
Projected (all columns so labeled)	11 of 11 ( all nos.)	1
Average 2004	11 of 11 (no.)	1

**PRODUCTION OF DOCUMENT REQUEST NO. 10**

<u>Location</u>		<u>Reason</u>
All pages – all number		2