



BellSouth Long Distance, Inc.
400 Perimeter Center Terrace
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Harris R. Anthony
Vice President & General Counsel

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February 2, 2004

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. 031046-TP: Petition and Complaint of AT&T Communications
of the Southern States, LLC against BellSouth Telecommunications, Inc.
and BellSouth Long Distance, Inc. for alleged anticompetitive pricing
of long distance service**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Long Distance, Inc.'s Request for Specified Confidential Classification, 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,

Harris R. Anthony
Harris R. Anthony (HRA)

cc: All Parties of Record

DOCUMENT NUMBER-DATE

01501 FEB-2 3

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 031046-TP

I HEREBY CERTIFY that a true and correct copy of BellSouth Long Distance, Inc.'s Request for Specified Confidential Classification, was served via Electronic Mail and U. S. Mail this 2nd day of February 2004 to the following:

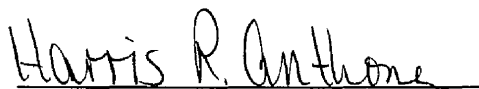
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition and Complaint of AT&T)
Communications of the Southern States, LLC) Docket No. 031046-TP
against BellSouth Telecommunications, Inc.)
and BellSouth Long Distance, Inc. for alleged)
Anticompetitive Pricing of Long Distance) Filed: January 30, 2004
Service)

**BELLSOUTH LONG DISTANCE, INC.'S REQUEST FOR
SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Long Distance, Inc. ("BSLD") hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, this Request For Specified Confidential Classification and states the following:

1. On January 15, 2004, BSLD filed a Motion for Summary Order (the "Motion"). Attached to the Motion was the Affidavit of James E. Lauter (the "Lauter Affidavit"), which itself had two attachments. The Motion, the Lauter Affidavit and the two attachments to the Lauter Affidavit all contain information that is considered confidential and proprietary to BSLD. A Notice of Intent to Request Specified Confidential Classification for these attachments was also filed.

2. Pursuant to Rule 25-22.06(3)(a), BSLD is now filing a Request for Confidential Classification for parts of the Motion, the Lauter Affidavit, and the two attachments, because these documents contain BSLD long distance plan specific customer information that is considered confidential and proprietary to BSLD. A more specific description of this information is contained in Attachment A.

3. BSLD has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally or publicly disclosed.

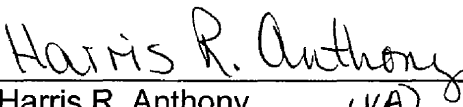
4. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents, including the material that is confidential and proprietary.

WHEREFORE, based on the foregoing, BSLD moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 2nd day of February 2004.

BELLSOUTH LONG DISTANCE, INC.



Harris R. Anthony (KA)
Vice President and General Counsel
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ATTACHMENT A

**BellSouth Long Distance, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BSLD'S MOTION FOR
SUMMARY ORDER AND THE LAUTER AFFIDAVIT AND THE ATTACHMENTS TO
THE LAUTER AFFIDAVIT**

Explanation of Proprietary Information

1. The attached information contains BSLD long distance plan specific information. This information shows historical customer minutes of use for the plan in question, as well as anticipated future usage under the plan. In addition, it shows average revenue per minute and average access costs under the plan, together with total revenue, total cost of goods sold, gross margins and cumulative gross margin for an average customer of the plan. In the highly competitive long distance market in Florida, the disclosure of this information to BSLD's competitors would give them an undue advantage and cause competitive harm to BSLD. BSLD treats this information as confidential information and protects it from disclosure. Therefore, this information constitutes proprietary confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.
2. The attached information contains the mix of BSLD traffic under the plan in question that is interstate versus intrastate together with resulting melded access charge cost insured by BSLD under the plan in question. The information also has cost data for services purchased by BSLD from other interexchange carriers. In the highly competitive long distance market in Florida, the disclosure of this information to BSLD's competitors would give them an undue advantage and cause competitive harm to BSLD. BSLD treats this information as confidential information and protects it from disclosure. Therefore, this information constitutes proprietary confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

LOCATION

REASON

- A. Motion
Page 3, lines 12, 13, 14, 22
Page 4, lines 1, 3, 4, 6, 7, 8

1
1

ATTACHMENT A

**BellSouth Long Distance, Inc.
FPSC Docket No. 031046-TP
Request for Specified Confidential Classification
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LOCATION

REASON

- | | | |
|----|--|-------------------|
| B. | <u>Lauter Affidavit</u>
Page 2, lines 17, 18, 20
Page 3, lines 4, 5, 6, 7, 9, 10, 11, 12, 15, 17, 19, 21
Page 4, lines 1, 2 | 1
1 and 2
1 |
| C. | <u>Attachment 1 to Lauter Affidavit</u>
Page 1, lines 6-26 | 1 |
| D. | <u>Attachment 2 to Lauter Affidavit</u>
Page 1, lines 1-9 | 1 and 2 |