

ORIGINAL

Legal Department

JAMES MEZA III  
Attorney  
BellSouth Telecommunications, Inc.  
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Tallahassee, Florida 32301  
(305) 347-5561

February 6, 2004

RECEIVED FPSC  
FEB -6 PM 4:50  
COMMISSION  
CLERK

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

**Re: 031125-TP: Complaint of IDS Telecom LLC against BellSouth Telecommunications, Inc., for over billing and discontinuance of service, and petition for emergency order restoring service**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for portions of its Partial Motion to Dismiss and Answer, 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,

*James Meza III*  
James Meza III (KA)

Enclosures

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

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
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OTH 1 *conf records*

This confidentiality request was filed by or for a "telco" for DN 01808-04. 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. 00725-04)

*Revised*  
DOCUMENT NUMBER-DATE

01806 FEB-6 04

FPSC-COMMISSION CLERK

*Redacted*  
DOCUMENT NUMBER-DATE

01807 FEB-6 04

FPSC-COM

*Confidential*  
DOCUMENT NUMBER-DATE  
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 031125-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via  
Electronic Mail and First Class U. S. Mail this 6th day of February, 2004 to the following:

Patty Christensen  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6191  
Fax. No. (850) 413-6192  
[pchriste@psc.state.fl.us](mailto:pchriste@psc.state.fl.us)

Marsha E. Rule  
Martin P. McDonnell  
Rutledge, Ecenia, Purnell & Hoffman  
215 South Monroe Street, Ste. 420  
Tallahassee, FL 32301  
Tel. No. (850) 681-6788  
Tel. No. (850) 681-6515  
Attys. for IDS  
[marsha@lawfla.com](mailto:marsha@lawfla.com)  
[marty@lawfla.com](mailto:marty@lawfla.com)



James Meza III (65)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint against BellSouth Telecommunications,) Docket No.: 031125-TP  
Inc. for alleged overbilling and discontinuance of service,)   
by IDS Telecom, LLC )  
\_\_\_\_\_ ) Filed: February 6, 2004

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

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

1. On January 16, 2004, BellSouth filed its Partial Motion to Dismiss and Answer ("Partial Motion"), portions of which contain confidential business information. A Notice of Intent to Request Specified Confidential Classification was also filed on that same day.
2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for portions of its Partial Motion because it contains competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.
3. BellSouth 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 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 which is confidential and proprietary.

WHEREFORE, based on the foregoing, BellSouth 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 6th day of February, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

\_\_\_\_\_  
NANCY B. WHITE (WA)

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558

*R. Douglas Lackey*

\_\_\_\_\_  
R. DOUGLAS LACKEY (WA)

675 W. Peachtree Street

Suite 4300

Atlanta, Georgia 30375

(404) 335-0747

526094

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 031125-TP  
Request for Specified Confidential Classification  
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2/6/04**

**REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION  
FOR PORTION'S OF BELLSOUTH'S PARTIAL MOTION TO DISMISS AND  
ANSWER FILED ON JANUARY 16, 2004**

**Explanation of Proprietary Information**

1. The subject information contains substantive reference to, or are documents from the BellSouth/IDS Settlement Agreement. Both BellSouth and IDS agreed to keep the information confidential. This information is proprietary to BellSouth and IDS and includes information containing customer proprietary and business proprietary information. The Commission has always zealously protected customer proprietary and business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

**LOCATION**

Page 6, lines 3-5

**REASON**

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