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February 13, 2004

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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: **Docket No. 030851-TP**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification of its Responses to Florida Public Commission's Staff's Fourth Set of Interrogatories, Item Nos. 75(b), 75(d) and 79, in 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.

Sincerely,

*Nancy B. White*

Nancy B. White (DA)

RECEIVED & FILED

*jh*

FPSC-BUREAU OF RECORDS

Enclosure

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

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

527131

This confidentiality request was filed by or for a "telco" for DNO2104-04 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. 01096-04)*

DOCUMENT NUMBER-DATE

02103 FEB 13 04

FPSC-COMMISSION CLERK

**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 13<sup>th</sup> day of February 2004 to the following:

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James Meza III (KA)

(+ )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: February 13, 2004  
\_\_\_\_\_ )

**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 January 23, 2004, BellSouth filed in the above-captioned proceeding, Responses to the Florida Public Service Commission Staff's Fourth Set of Interrogatories. The attachments to BellSouth's Response to Staff's Fourth Set of Interrogatories, Item Nos. 75(b), 75(d) and 79 include confidential business information that is considered proprietary to BellSouth. BellSouth filed a Notice of Intent to Request Specified Confidential Classification on that same day.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the above referenced attachment contains confidential business information that is proprietary to BellSouth. 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 in future negotiations. The information discussed in 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 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 documents 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 13<sup>th</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

*Nancy B. White*

NANCY B. WHITE (eA)

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ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
2/13/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO STAFF'S FOURTH SET OF INTERROGATORIES, ATTACHMENT  
TO ITEM NOS. 75 AND 79 FILED JANUARY 23, 2004,  
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. 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.
2. BellSouth purchased this document from Telecordia pursuant to a contract that requires BellSouth to keep this information confidential, and which bars disclosure to third parties.

<u>Location</u>	<u>Reason</u>
<u>No. 75 (Attachments)</u>	
75(b) – Entire Document	1
75(d) – Entire Document	1
<u>No. 79 (Attachment)</u>	
Entire Document	1,2