

Nancy B. White  
General Counsel-Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
305 347-5558

February 18, 2004

RECEIVED-FL-SC  
08-FEB-18  
COMMISSION  
CLERK  
08 FEB 18 PM 4:50

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. 030852-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Response to AT&T's First Request for Production of Documents Nos. 1 and 3 provided on CD-Rom, 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 (LH)

Enclosure

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

This confidentiality request was filed by or for a "telco" for DN 02372-04. 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.

527811

1 GCL  
1 Sec  
1 conf records

Confidential CD-Rom  
DOCUMENT NUMBER-DATE  
02372 FEB 18  
FPSC-COMMISSION CLERK

*Request*  
DOCUMENT NUMBER-DATE  
02370 FEB 18  
FPSC-COMMISSION CLERK

*Redacted*  
DOCUMENT NUMBER-DATE  
02371 FEB 18  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 030852-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery\* and FedEx this 18<sup>th</sup> day of February 2004 to the following:

Adam Teitzman, Staff Counsel\*  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6212  
Fax: (850) 413-6250  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)

Michael A. Gross  
VP Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assoc.  
246 East 6th Avenue, Ste. 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

Matthew Feil (+)  
Scott Kassman  
FDN Communications  
2301 Lucien Way  
Suite 200  
Maitland, FL 32751  
Tel. No. 407 835-0460  
Fax No. 407 835-0309  
[mfeil@mail.fdn.com](mailto:mfeil@mail.fdn.com)  
[skassman@mail.fdn.com](mailto:skassman@mail.fdn.com)

Joseph A. McGlothlin+Ⓢ  
Vicki Gordon Kaufman+  
McWhirter, Reeves, McGlothlin,  
Davidson, Kaufman & Arnold PA  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[jmclothlin@mac-law.com](mailto:jmclothlin@mac-law.com)  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents FCCA

Mr. Charles E. Watkins+  
1230 Peachtree Street, NE  
19th Floor  
Atlanta, GA 30309-3574  
Phone: (404) 942-3492  
Fax: (404) 942-3495  
Represents Covad  
[gwatkins@covad.com](mailto:gwatkins@covad.com)  
[jbelle@covad.com](mailto:jbelle@covad.com)

Nanette Edwards, Esq.+  
Director – Regulatory  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
Tel. No. (256) 382-3856  
Represent ITC^DeltaCom  
[nedwards@itcdeltacom.com](mailto:nedwards@itcdeltacom.com)

Ms. Donna C. McNulty+ⓧ  
MCI WorldCom Communications, Inc.  
1203 Governors Square Blvd.,  
Suite 201  
Tallahassee, FL 32301-2960  
Phone No. 850- 219-1008  
Fax No. 850 219-1018  
Represents MCI WorldCom  
[donna.mculty@mci.com](mailto:donna.mculty@mci.com)

De O'Roark, Esq. (+)  
MCI WorldCom Communications, Inc (GA)  
Six Concourse Parkway  
Suite 3200  
Atlanta, GA 30328  
Represents MCI WorldCom  
[de.oroark@mci.com](mailto:de.oroark@mci.com)

Floyd Self, Esq.+  
Norman H. Horton, Esq.~  
Messer Capareello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
Represents ITC^DeltaCom  
Represents MCI  
Represents KMC  
Represents Xspedius~  
[fself@lawfla.com](mailto:fself@lawfla.com)  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)

Tracy Hatch, Esq. \*\*  
AT&T  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
Tel. No. (850) 425-6364  
[thatch@att.com](mailto:thatch@att.com)

Lisa A. Sapper+ⓧ  
AT&T  
1200 Peachtree Street, N.E.  
Suite 8100  
Atlanta, GA 30309  
Tel. No. (404) 810-7812  
[lisariley@att.com](mailto:lisariley@att.com)

Marva Brown Johnson, Esq.  
KMC Telecom III, LLC  
1755 North Brown Road  
Lawrenceville, GA 30043-8119  
Tel. No. (678) 985-6261  
Fax No.: (678) 985-6213  
Represents KMC  
[marva.johnson@kmctelecom.com](mailto:marva.johnson@kmctelecom.com)

Richard A. Chapkis (+)  
Kimberly Caswell  
Verizon Florida, Inc.  
One Tampa City Center  
201 North Franklin Street (33602)  
Post Office Box 110, FLTC0007  
Tampa, Florida 33601-0110  
Tel. No. (813) 483-2606  
Fax. No. (813) 204-8870  
Represents Verizon  
[Richard.chapkis@verizon.com](mailto:Richard.chapkis@verizon.com)

Susan S. Masterton, Esq. +  
Sprint-Florida, Inc.  
Sprint Communications Co. L.P.  
1313 Blair Stone Road  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
Tel. No. (850) 599-1560  
Fax. No. (850) 878-0777  
[susan.masterton@mail.sprint.com](mailto:susan.masterton@mail.sprint.com)

Jean Houck  
Business Telecom, Inc.  
4300 Six Forks Road  
Raleigh, NC 27609  
Tel. No. (919) 863-7325  
[jean.houck@btitelecom.net](mailto:jean.houck@btitelecom.net)

Jake E. Jennings +  
NewSouth Communications Corp  
Two North Main Center  
Greenville, SC 29601-2719  
Tel. No.: 864 672-5877  
Fax No.: 864 672-5313  
[jejennings@newsouth.com](mailto:jejennings@newsouth.com)

Jon Moyle, Jr.  
Moyle Law Firm (Tall)  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: 681-8788  
Represents NuVox Communications Inc.  
Email: [jmoylejr@moylelaw.com](mailto:jmoylejr@moylelaw.com)

**Allegiance E-mail Only**  
[charles.gerkin@algx.com](mailto:charles.gerkin@algx.com)

Terry Larkin  
Allegiance Telecom, Inc.  
700 East Butterfield Road  
Lombard, IL 60148  
Phone: (630) 522-6453  
[terry.larkin@algx.com](mailto:terry.larkin@algx.com)

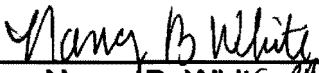
Jorge Cruz-Bustillo +  
Assistant General Counsel  
Supra Telecommunications  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133  
Tel. No. (305) 476-4252  
Fax. No. (305) 443-1078  
[jorge.cruz-busitillo@stis.com](mailto:jorge.cruz-busitillo@stis.com)

Jonathan Audu \*\*  
Manager, Regulatory Affairs  
Supra Telecommunications  
1311 Executive Center Drive  
Suite 220  
Tallahassee, FL 32301-5027  
Tel. No. (850) 402-0510  
Fax. No. (850) 402-0522  
Email: [jonathan.audu@stis.com](mailto:jonathan.audu@stis.com)

**AT&T by E-Mail only:**  
[soniadaniels@att.com](mailto:soniadaniels@att.com)

Bo Russell  
Nuvox Communications Inc.  
301 North Main Street  
Greenville, SC 29601-2171  
Phone: (864) 331-7323  
Email: [brussell@nuvox.com](mailto:brussell@nuvox.com)

J. Jeffry Wahlen  
Ausley & McMullen  
227 South Calhoun Street  
Tallahassee, FL 32301  
Tel. No. (850) 425-5471  
Fax. No. (850) 222-7560  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

  
\_\_\_\_\_  
Nancy B. White (RM)

**(+)** signed protective agreement  
**(\*)** via Hand Delivery  
**(⊗)** via FedEx

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising )  
from Federal Communications Commission )  
Triennial UNE review: Location Specific-Review )  
For DS1, DS3, and Dark Fiber Loops and )  
Route-Specific Review for DS1, DS3, and Dark )  
Fiber Transport )  
\_\_\_\_\_ )

Docket No. 030852-TP

Filed: February 18, 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 28, 2004, BellSouth filed in the above-captioned proceeding, its Responses to AT&T's First Set of Interrogatories and First Requests for Production of Documents, Item Nos. 1 and 3, (hereinafter "AT&T"). The documents responsive to AT&T's First Request for Production of Documents Nos. 1 and 3, contain confidential business information that is considered proprietary. 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 above-listed attachments contain 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

DOCUMENT NUMBER-DATE

02370 FEB 18 3

FPSC-COMMISSION CLERK

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 18<sup>th</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558



R. DOUGLAS LACKEY

MEREDITH E. MAYS

Suite 4300

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0750

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030852-TP  
Request for Confidential Classification  
Page 1 of 1  
2/18/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO AT&T'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 1 AND 3, FILED JANUARY 28, 2004,  
IN FLORIDA DOCKET NO. 030852-TP**

**Explanation of Proprietary Information**

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>Request for Production, Item No. 1</u>	
Entire Pages - Bates Nos. BST000001-000151	2
<u>Request for Production, Item No. 3</u>	
Entire Pages - Bates Nos. BST000154-000362	2