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February 23, 2004

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

RECEIVED-1130  
04 FEB 23 PM 4:51  
COMMISSION  
CLERK

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 for its First Supplemental Responses to Florida Public Commission Staff's Fourth Request for Production of Documents, No. 30, 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 (KA)

Enclosure

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

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CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
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FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN 0264504. 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.

DOCUMENT NUMBER-DATE

02643 FEB 23 03

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 23<sup>rd</sup> day of February 2004 to the following:

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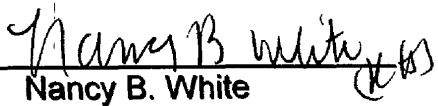
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Nancy B. White

**(+ )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 23, 2004  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S**  
**FIRST SUPPLEMENTAL RESPONSES TO**  
**STAFF'S FOURTH REQUESTS FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.280, Florida Rules of Civil Procedure, hereby files the following First Supplemental Responses to Florida Public Commission Staff's (hereinafter "Staff") Fourth Requests for Production of Documents, dated January 8, 2004.

BellSouth incorporates herein by reference all of its general objections filed on January 15, 2004. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections.

**SUPPLEMENTAL RESPONSES**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 030851-TP  
Staff's 4th Requests for Production  
January 8, 2004

**SUPPLEMENTAL RESPONSE** Item No. 29  
Page 1 of 1

**REQUEST:** Please provide BellSouth Serving Area Geographic Markets with UNE Zones 1-3 Divided by CEA subdivided with wire centers.

**RESPONSE:** BellSouth interprets this Request as seeking information concerning the wire centers associated with each of BellSouth's proposed markets. As reflected in its filing on January 22, 2004, BellSouth has corrected the association of four wire centers to the appropriate CEA. This has resulted in one additional market (Fort Lauderdale FL, Zone 3), for a total of 32 markets. The Attachment to this request which reflects this information is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-01-23/>.

The file name is:  
FL\_030851-TP\_BST\_TO\_STAFF\_4TH\_POD\_ATTACH\_29

BellSouth witnesses will supplement testimony and exhibits as necessary to reflect these changes.

**SUPPLEMENTAL RESPONSE:**

BellSouth interprets this Request as seeking information concerning the wire centers associated with each of BellSouth's proposed markets. The attachment previously referenced in this request did not include the four wire centers that were inadvertently omitted from BellSouth's original BACE model filing in Florida but which have since been added. Information concerning these four wire centers is contained in Attachment 29-1. Additional information responsive to this request is contained in BellSouth's Response to Staff's Seventh Set of Interrogatories, Item No 180.

**RESPONSE PROVIDED BY:** Pamela Tipton

REQUEST: For the purpose of the following request, please refer to the direct testimony of Bellsouth's witness Tipton, page 10, line 1 through page 11, line 21. Please provide the database or spreadsheet sorted by BellSouth Wire center, CLEC number (as indicated on Exhibit PAT-5), and customer location, indicating quantity of DS0 lines per location.

RESPONSE: Information concerning the wire center, CLEC number as indicated on Exhibit PAT-5, and the number of customer locations in each wire center is available via the following URL link:  
<http://bellsouthcorp.com/policy/triennialreview/filings/2004-01-23/>.

The file name is:  
FL\_030851-TP\_BST\_TO\_STAFF\_4TH\_POD\_ATTACH\_30

BellSouth is continuing to gather information concerning the customer locations and quantity of DS0s at each location, to the extent available, and will supplement its response to this Request when this process is complete.

SUPPLEMENTAL RESPONSE:

BellSouth witness Pamela A. Tipton's revised Exhibit PAT-5 was filed on January 28, 2004. Attachment 30-1 includes both the CLEC-provided and BellSouth internal data used to produce the revised Tipton Exhibit PAT-5.

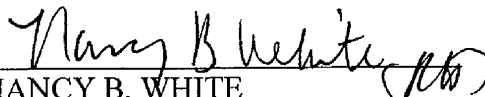
To the extent available to BellSouth, Attachment 30-2 provides the customer location and DS0 line per location data responsive to this request. BellSouth does not have line count data by individual customer location for those CLECs whose self-reported data was used to produce revised Tipton Exhibit PAT-5. This information is proprietary and is being provided subject to the parties protective agreement.

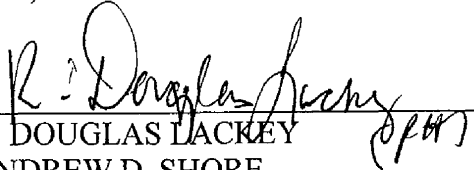
RESPONSE PROVIDED BY: Pamela Tipton



Respectfully submitted this 23<sup>rd</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

  
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**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 23, 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 February 23, 2004, BellSouth filed its First Supplemental Responses to Florida Public Commission Staff's (hereinafter "Staff") Fourth Requests for Production of Documents.
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, Item No. 30, includes confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause harm to the third-party providers. Therefore, such information should be classified as confidential 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 document containing the confidential information.

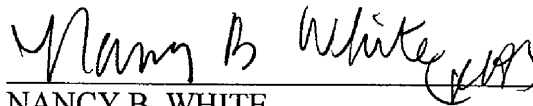
5. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

6. The 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 23<sup>th</sup> day of February, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 4  
02/23/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF FIRST SUPPLEMENTAL  
RESPONSES TO STAFF'S FOURTH REQUESTS FOR PRODUCTION OF  
DOCUMENTS, ITEM NO 30, FILED FEBRUARY 23, 2004 IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. The subject information confidential business information related to the competitive interests of third-party companies that is proprietary. If this information were disclosed publicly, it could cause harm to third-party companies. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 4  
02/23/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF FIRST SUPPLEMENTAL  
RESPONSES TO STAFF'S FOURTH REQUESTS FOR PRODUCTION OF  
DOCUMENTS, ITEM NO 30, FILED FEBRUARY 23, 2004 IN  
FLORIDA DOCKET NO. 030851-TP**

**SUBPOENA, ITEM NO. 4**

<u>Location</u>		<u>Reason</u>
<u>Columns Labeled</u>	<u>Pages</u>	
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