

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.

DOCKET NO. 030851-TP  
ORDER NO. PSC-04-0193-CFO-TP  
ISSUED: February 23, 2004

ORDER GRANTING REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF SPECIFIED BELL SOUTH TELECOMMUNICATIONS, INC. DOCUMENTS

I. Case Background

In response to the Federal Communications Commission's ("FCC's") August 21, 2003, Triennial Review Order ("TRO"), this Commission opened two dockets to ascertain whether a requesting carrier is impaired by lack of access to certain incumbent local exchange companies' network elements.

BellSouth Telecommunications, Inc. (BellSouth) has filed numerous Requests for Specified Confidential Classification for certain documents. The chart below shows the date of the request and the document at issue.

Month of Request	Document No.	Attachment
October		
November		
17 <sup>th</sup>	11561-03	A
December		
8 <sup>th</sup>	12628-03	B
10 <sup>th</sup>	12822-03	C
11 <sup>th</sup>	12906-03	D
16 <sup>th</sup>	13092-03	E
22 <sup>nd</sup>	13331-03	F
22 <sup>nd</sup>	13333-03	G
23 <sup>rd</sup>	13427-03	H
30 <sup>th</sup>	13559-03	I
30 <sup>th</sup>	13570-03	J
31 <sup>st</sup>	12966-03	K

DOCUMENT NUMBER-DATE

02665 FEB 23 04

FPSC-COMMISSION CLERK

Month of Request	Document No.	Attachment
December		
31 <sup>st</sup>	13620-03	L
January		
20 <sup>th</sup>	00833-04	M
20 <sup>th</sup>	00836-04	N
20 <sup>th</sup>	13529-03 01027-04	O
26 <sup>th</sup>	01143-04	P
26 <sup>th</sup>	01145-04	Q
29 <sup>th</sup>	01360-04	R
February		
3 <sup>rd</sup>	01606-04	T
12 <sup>th</sup>	02052-04	U
12 <sup>th</sup>	02055-04	V
13 <sup>th</sup>	02104-04	W
17 <sup>th</sup>	02263-04	X
17 <sup>th</sup>	02369-04	Y
17 <sup>th</sup>	02375-04	Z
17 <sup>th</sup>	02444-04	AA
19 <sup>th</sup>	02447-04	BB

## II. Analysis

In its request, BellSouth asks for protection of the specific pages and line numbers as set forth in Attachments A through BB, which are attached and incorporated in this Order by reference. BellSouth contends that release of this information would provide its competitors with an undue competitive advantage in that they would have access to this competitively sensitive, confidential information.

Florida law presumes that documents submitted to governmental agencies shall be public records. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to the specific terms of a statutory provision. This presumption is based on the concept that government should operate in the "sunshine." Rule 25-22.006(4)(c), Florida Administrative Code, provides that it is the Company's burden to demonstrate that the documents fall into one of the statutory examples set

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out in Section 364.183, Florida Statutes, or to demonstrate that the information is proprietary confidential information, the disclosure of which will cause the Company or its ratepayers harm.

Section 364.183(3), Florida Statutes, states that “proprietary confidential business information” is:

[o]wned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Based on the definition of proprietary confidential business information in Section 364.183(3), Florida Statutes, it appears that the information for which BellSouth seeks confidential classification is information that, if disclosed, would cause harm to BellSouth's competitive interests and its business operations. Thus, this information qualifies as proprietary confidential business information under Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. As such, BellSouth's request for confidential classification is hereby granted.

Based on the foregoing, it is


ORDERED by Commissioner Charles M. Davidson, as Prehearing Officer, that BellSouth Florida, Inc.'s Requests for Specified Confidential Classification of the referenced documents as set forth herein are hereby granted. It is further

ORDERED that pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, any confidentiality granted to the material specified herein shall expire eighteen (18) months from the date of the issuance of this Order in the absence of a renewed request for confidentiality pursuant to Section 364.183, Florida Statutes. It is further

ORDERED that this Order will be the only notification by the Commission to the parties concerning the expiration of the confidentiality time period.

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By ORDER of Commissioner Charles M. Davidson, as Prehearing Officer, this 23rd  
day of February, 2004.

  
\_\_\_\_\_  
CHARLES M. DAVIDSON  
Commissioner and Prehearing Officer

( S E A L )

JLS/JPR

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.0376, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of the Commission Clerk and Administrative Services, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network usage forecasts, network utilization data, network switch line growth/loss, and network trunk terminations. *If this information were disclosed publicly, it could cause harm to BellSouth in its operations and would damage the competitive interests of BellSouth.* Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).
3. This information contains competitive business information. The subject information includes internal methods and procedures, job aids, and force sizing models. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which 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.

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 1<sup>st</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
FLORIDA DOCKET NO. 030851-TP

**INTERROGATORY, ITEM NO. 21**

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Res. Lines (3 <sup>rd</sup> column)	all pages (all nos.)	1
% of Total Res. Access Lines in CLLI (4 <sup>th</sup> column)	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 22**

Local	all pages (all nos.)	1
Toll	all pages (all nos.)	1
Other	all pages (all nos.)	1
Total	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 56**

Res (3 <sup>rd</sup> column)	all pages (all nos.)	1
Bus (4 <sup>th</sup> column)	all pages (all nos.)	1
CTX (5 <sup>th</sup> column)	all pages (all nos.)	1
PBX (6 <sup>th</sup> column)	all pages (all nos.)	1
Public (7 <sup>th</sup> column)	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 62**

Number of Premises	1 (all nos.)	1
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**INTERROGATORY, ITEM NO. 64**

Trunk T1s Spare (2 <sup>nd</sup> column)	all pages (all nos.)	2
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**INTERROGATORY, ITEM NO. 84**

Location

RESPONSE:

Reason

Second line, sixth and seventh words

1

**INTERROGATORY, ITEM NO. 85**

RESPONSE:

Column Labeled

Page Numbers

Reason

Physical Revenues  
Virtual Revenues

1 of 2 (all nos.)  
1 of 2 (all nos.)

1  
1

Row Labeled

Page Numbers

Reason

2002 (line 1)

2 of 2 (all nos.)

1

**INTERROGATORY, ITEM NO. 105 (a)**

Column Labeled

Page Numbers

Reason

2003 (3<sup>rd</sup> column)  
2004 (4<sup>th</sup> column)  
2005 (5<sup>th</sup> column)  
2006 (6<sup>th</sup> column)  
2007 (7<sup>th</sup> column)

all pages (all nos.)  
all pages (all nos.)  
all pages (all nos.)  
all pages (all nos.)  
all pages (all nos.)

2  
2  
2  
2  
2

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**BellSouth Telecommunications, Inc.**  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO AT&T'S 1<sup>st</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
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**INTERROGATORY, ITEM NO. 105 (b)**

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Analog NALS	all pages (all nos.)	2
TR-008 IDLC	all pages (all nos.)	2
GR303 IDLC	all pages (all nos.)	2
ISDN BRI	all pages (all nos.)	2
Trunk T1s	all pages (all nos.)	2
PRI	all pages (all nos.)	2

**INTERROGATORY, ITEM NO. 106**

1/1/2003 (2 <sup>nd</sup> column)	all pages (all nos.)	2
9/1/2003 (3 <sup>rd</sup> column)	all pages (all nos.)	2
Growth/Loss (4 <sup>th</sup> column)	all pages (all nos.)	2

**INTERROGATORY, ITEM NO. 107**

<u>RESPONSE:</u>	<u>Page Number</u>	<u>Reason</u>
a) UNE loops	1 ( number)	1
b) UNE-P	1 ( number)	1
c) Resale	1 ( number)	1



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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO AT&T'S 1<sup>st</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**PRODUCTION OF DOCUMENT REQUEST NO. 1**

Entire Document 3

**PRODUCTION OF DOCUMENT REQUEST NO. 7**

Entire Document 3

**PRODUCTION OF DOCUMENT REQUEST NO. 8**

Location

<u>Page Labeled</u>	<u>Reason</u>
N&CS Forecasting Process (entire page)	3
Local Centers; Force & Capacity Planning (entire page)	3

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
LCSC SR Ordering	1 of 4 (all nos.)	3
Actuals (all columns so labeled)	2 of 4 (all nos.)	3
Actuals (all columns so labeled)	3 of 4 (all nos.)	3
Projected (all columns so labeled)	3 of 4 (all nos.)	3
Projected (all columns so labeled)	4 of 4 (all nos.)	3
Average 2004	4 of 4 (all nos.)	3

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 106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
 NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
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**PRODUCTION OF DOCUMENT REQUEST NO. 8 (cont.)**

Location

<u>Column Labeled</u>	<u>Row Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
A	+ UNE maintenance	1 of 11	3
A	+ Resale Maintenance	1 of 11	3
A	+ UNE Provisioning	1 of 11	3
A	Total CWINS Modeled WS32 Force	1 of 11	3
C= A-B	+ UNE maintenance	1 of 11	3
C= A-B	+ Resale Maintenance	1 of 11	3
C= A-B	+ UNE Provisioning	1 of 11	3
C= A-B	Total CWINS Modeled WS32 Force	1 of 11	3

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
B=D+E	1 of 11 (all nos.)	3
D	1 of 11 (all nos.)	3
E	1 of 11 (all nos.)	3
Jan - Jun (all columns so labeled)	2 of 11 (all nos.)	3
Average (all columns so labeled)	2 of 11 (all nos.)	3
Jul-Aug (all columns so labeled)	2 of 11 (all nos.)	3
Actuals (all columns so labeled)	3 of 11 (all nos.)	3
Actuals (all columns so labeled)	4 of 11 (all nos.)	3
Projected (all columns so labeled)	4 of 11 (all nos.)	3
Projected (all columns so labeled)	5 of 11 (all nos.)	3
Average 2004	5 of 11 (no.)	3
Actuals (all columns so labeled)	6 of 11 (all nos.)	3
Actuals (all columns so labeled)	7 of 11 (all nos.)	3

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TO AT&T'S 1<sup>st</sup> INTERROGATORIES ITEM NOS. 21, 22, 56, 62, 64, 84, 85, 105(a), 105(b),  
106, AND 107 AND REQUEST FOR PRODUCTION OF DOCUMENTS, REQUEST  
NOS. 1, 7, AND 8, FILED OCTOBER 27, 2003, IN  
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PRODUCTION OF DOCUMENT REQUEST NO. 8 (cont.)

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Projected (all columns so labeled)	7 of 11 ( all nos.)	3
Projected (all columns so labeled)	8 of 11 ( all nos.)	3
Average 2004	8 of 11 (no.)	3
Actuals (all columns so labeled)	9 of 11 ( all nos.)	3
Actuals (all columns so labeled)	10 of 11 ( all nos.)	3
Projected (all columns so labeled)	10 of 11 ( all nos.)	3
Projected (all columns so labeled)	11 of 11 ( all nos.)	3
Average 2004	11 of 11 (no.)	3

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO FCCA'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 2, 3, 4, 5, 6, 10 and 12 FILED  
NOVEMBER 17, 2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network usage forecasts, network utilization data, network switch line growth/loss, and network trunk terminations. If this information were disclosed publicly, it could cause harm to BellSouth in its operations and would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO FCCA'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 2, 3, 4, 5, 6, 10 and 12 FILED  
NOVEMBER 17, 2003, IN  
FLORIDA DOCKET NO. 030851-TP

**INTERROGATORY, ITEM NO. 2-2**

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Analog SPA (3 <sup>rd</sup> Column)	all pages (all nos.)	1
DS1 SPA (4 <sup>th</sup> column)	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 2-3**

Last 3 Mos (3 <sup>rd</sup> Column)	all pages (all nos.)	1
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**INTERROGATORY, ITEM NO. 3-1**

Analog (3 <sup>rd</sup> column)	all pages (all nos.)	1
Other (4 <sup>th</sup> column)	all pages (all nos.)	1
DS1 (5 <sup>th</sup> column)	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 3-2**

Analog SPA (3 <sup>rd</sup> Column)	all pages (all nos.)	1
DS1 SPA (4 <sup>th</sup> column)	all pages (all nos.)	1

**INTERROGATORY, ITEM NO. 3-3**

Bus Combo (3 <sup>rd</sup> Column)	all pages (all nos.)	1
Res Combo (4 <sup>th</sup> Column)	all pages (all nos.)	1

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INTERROGATORY, ITEM NO. 4-1

Analog (3 <sup>rd</sup> column)	all pages (all nos.)	1
Other (4 <sup>th</sup> column)	all pages (all nos.)	1
DS1 (5 <sup>th</sup> column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 4-2

Analog SPA (3 <sup>rd</sup> Column)	all pages (all nos.)	1
DS1 SPA (4 <sup>th</sup> column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 4-3

Bus Combo (3 <sup>rd</sup> Column)	all pages (all nos.)	1
Res Combo (4 <sup>th</sup> Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 5-1

Retail Business Units (3 <sup>rd</sup> Column)	all pages (all nos.)	1
Retail Residence Units (4 <sup>th</sup> Column)	all pages (all nos.)	1
Total Retail Units (5 <sup>th</sup> Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 6-1

DS1 SPA (3 <sup>rd</sup> Column)	all pages (all nos.)	1
DS3 SPA (4 <sup>th</sup> Column)	all pages (all nos.)	1

INTERROGATORY, ITEM NO. 10-1

Locations (2 <sup>nd</sup> Column)	all pages (all nos.)	1
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INTERROGATORY, ITEM NO. 12-1

Entire Document		2
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BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO COVAD'S 1<sup>st</sup> INTERROGATORIES NO. 3 FILED  
DECEMBER 10, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information contains competitive business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act. Fl. Stat. § 364.183 (3)(e).

<u>Location</u>	<u>Reason</u>
Highlighted number(s) in lines 7, 8 and 12	1

ATTACHMENT A

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCP'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST  
FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119,  
122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, 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. Specifically, this information relates to revenue, and/or line counts for specific retail and wholesale services. 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.
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST  
FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119,  
122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN  
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INTERROGATORY, ITEM NO. 121-ATTACHMENT

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Dec 2002 Column		1
Aug 2003		1

INTERROGATORY, ITEM NO. 167-ATTACHMENT

Line UNE loops		1
Line UNE-P		1
Line Resale		1

POD No. 1, INTERROGATORY NO. 33

Entire Document	all pages (BST000034- BST000419)	3
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POD No. 1, INTERROGATORY NO. 36

Entire Document	all pages (BST000420- BST000528)	3
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POD No. 1, INTERROGATORY NO. 40

Entire Document	all pages (BST000534- BST000572)	3
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 51**

Total Volume Line	BST000574- BST000575	1
Monthly Fallout Rate Line	BST000576- BST000577	

**POD No. 1, INTERROGATORY NO. 52**

Total Volume Line	BST000579- BST000580	1
Monthly Fallout Rate Line	BST000581- BST000582	

**POD No. 1, INTERROGATORY NO. 59**

Entire Document	all pages BST000592- BST000596	3
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**POD No. 1, INTERROGATORY NO. 78**

Entire Document	all pages BST000605- BST000616	3
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**POD No. 1, INTERROGATORY NO. 82**

Entire Document	all pages BST000617- BST000622	3
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ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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12/11/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST  
FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119,  
122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN  
FLORIDA DOCKET NO. 030851-TP

POD No. 1, INTERROGATORY NO. 97

EQPT Column	BST000624-	2
	BST000630	
EQPT Column	BST000631-	
(f) and (g) Column	BST000635	
(h) and (i) Column	BST000636-	2
	BST000638	
Entire Page	BST000669-	2
	BST000732	

POD No. 1, INTERROGATORY NO. 101

Entire Document	BST000733-	2
	BST000734	

POD No. 1, INTERROGATORY NO. 118

Res Lines Column	BST000887-	1
% of Total Res Column	BST000901	
Res Column, Bus Column, CTX Column, PBX Column, Public Column	BST000902-	1
	BST000906	
All numbers in Table	BST000907-	1
	BST000912	

POD No. 1, INTERROGATORY NO. 119

All numbers in last three columns	BST000914	1
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ATTACHMENT A

BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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12/11/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO MCI'S 1<sup>st</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN FLORIDA DOCKET NO. 030851-TP**

**POD No. 1, INTERROGATORY NO. 122**

Last four Columns	BST000916- BST000935	1
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**POD No. 1, INTERROGATORY NO. 123**

Last four columns	BST000937- BST001051	2
Last two columns	BST001052- BST001055	2

**POD No. 1, INTERROGATORY NO. 124**

Entire Document	BST001056- BST001359	3
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**POD No. 1, INTERROGATORY NO. 126**

Entire Document	BST001360- BST001510	3
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**POD No. 1, INTERROGATORY NO. 159**

Eqpt Column, y/b 2004 Column, y/b 2005 Column y/b 2006 Column, y/b 2007 Column, y/b 2008 Col	BST001512- BST001516	2
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ATTACHMENT A

BellSouth Telecommunications, Inc.  
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12/11/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE TO MCI'S 1<sup>ST</sup> INTERROGATORIES ITEM NOS. 121 and 167, AND FIRST REQUEST FOR PRODUCTION, NO. 1, ITEM NOS. 33, 36, 40, 51, 52, 59, 78, 82, 97, 101, 118, 119, 122, 123, 124, 126, 159, 160, 161, 165, 166 AND 194 FILED NOVEMBER 20, 2003, IN FLORIDA DOCKET NO. 030851-TP

POD No. 1, INTERROGATORY NO. 160

Entire Document	BST001517- BST001522	2
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POD No. 1, INTERROGATORY NO. 161

Last five columns	BST001524- BST001528	2
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POD No. 1, INTERROGATORY NO. 165

Entire Document	BST001529- BST001533	1
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POD No. 1, INTERROGATORY NO. 166

Last six columns	BST001535- BST001538	1
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POD No. 1, INTERROGATORY NO. 194

Last five columns	BST001540- BST001544	2
Last six columns	BST001545- BST001549	2

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
12/16/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO COVAD'S 1<sup>st</sup> INTERROGATORIES NO. 6 AND REQUEST FOR PRODUCTION,  
NO. 1 FILED NOVEMBER 25, 2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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. This information contains competitive business information. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Specifically, this information contains confidential information on BellSouth's internal marketing plan regarding bundled services. Therefore, such information is trade secret which should be classified as proprietary, confidential business information, exempt from the Open Records Act. Fl. Stat. § 364.183 (3)(e).

Location

Reason

**Interrogatory No. 6**

Local	all pages (all nos.)	1
Toll	all pages (all nos.)	1
Other	all pages (all nos.)	1
Total	all pages (all nos.)	1

**POD No. 1**

Entire Document

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 2  
12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST SET OF INTERROGATORIES (NO.  
1) AND FIRST REQUEST FOR PRODUCTION (NO.1) FILED DECEMBER 4, 2003, 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. Specifically, this information relates to retail customer churn percentages. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida.
2. 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. Specifically, this information relates to revenue, and/or line counts for specific retail and wholesale services. 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.

ORDER NO. PSC-04-019.3CFO-TP  
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PAGE 24

ATTACHMENT F

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
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Page 2 of 2  
12/22/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST SET OF INTERROGATORIES (NO.  
1) AND FIRST REQUEST FOR PRODUCTION (NO.1) FILED DECEMBER 4, 2003, IN  
FLORIDA DOCKET NO. 030851-TP

INTERROGATORY, ITEM NO. 1

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Line 2	Pg 2 of 2 (Response)	1
Line 7	Pg 2 of 2 (Response)	1

POD NO. 1, (Document responsive to Interrogatory No. 194)

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Last five columns (all numbers)	Pg 1-4	2
Last five columns (all numbers TOP of page)	Pg 5	2
Bottom of page-Columns fc, fd, fe, fg, fh, fi	Pg 5	2
Columns fc, fd, fe, fg, fh, fi	Pg 6-9	2
DS1 Column	Pg 10-13	2
DS3 Column	Pg 14-16	2



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 3  
12/22/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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.

ORDER NO. PSC-04-0193-CFO-TP  
DOCKET NO. 030851-TP  
PAGE 26

ATTACHMENT G

ATTACHMENT A

BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
Page 1 of 3  
12/22/03

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO FCCA'S 2<sup>nd</sup> SET OF INTERROGATORIES ITEM NO. 24 FILED DECEMBER 1,  
2003, IN  
FLORIDA DOCKET NO. 030851-TP

INTERROGATORY, ITEM NO. 2-2

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Jul 2003 Line	In response	1
Aug 2003 Line	In response	1
Sept 2003 Line	In response	1

ATTACHMENT A

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 1**  
**12/23/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS PAT-5 AND PAT-7 OF THE DIRECT TESTIMONY OF PAMELA A. TIPTON, DIRECT TESTIMONY OF DEBRA J. ARON AND EXHIBITS DJA-03 AND DJA-04, AND A CD-ROM CONTAINING THE BELLSOUTH ANALYSIS OF COMPETITIVE ENTRY (BACE) MODEL FILED WITH THE DIRECT TESTIMONY OF JAMES W. STEGEMAN FILED DECEMBER 4, 2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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.

<u>Location</u>	<u>Reason</u>
<b>EXHIBIT PAT-5</b>	
Page 1 of 2, Column B, Lines 2-51	1
Page 2 of 3, Column B, Lines 1-33	1
<b>EXHIBIT PAT-7</b>	
All names identified	1
<b>DIRECT TESTIMONY OF DEBRA J. ARON</b>	
Page 29, Lines 2-4	1
Page 36, Line 12	1
Page 39, line 18	1

BellSouth Telecommunications, Inc.  
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Page 1 of 1  
12/23/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF EXHIBITS PAT-5 AND  
PAT-7 OF THE DIRECT TESTIMONY OF PAMELA A. TIPTON, DIRECT  
TESTIMONY OF DEBRA J. ARON AND EXHIBITS DJA-03 AND DJA-04, AND A CD-  
ROM CONTAINING THE BELLSOUTH ANALYSIS OF COMPETITIVE ENTRY  
(BACE) MODEL FILED WITH THE DIRECT TESTIMONY OF JAMES W.  
STEGEMAN FILED DECEMBER 4, 2003, IN FLORIDA DOCKET NO. 030851-TP**

<u>Location</u>	<u>Reason</u>
Exhibit DJA-03, Columns A-E	1
Exhibit DJA-04, Columns A-C	1
<b>BACE MODEL ON CD</b>	
Entire CD	1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
12/30/03

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REVISED EXHIBIT PAT-5  
OF THE DIRECT TESTIMONY OF PAMELA A. TIPTON FILED  
DECEMBER 30, 2003, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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.

Location

Reason

**EXHIBIT PAT-5**

Page 1 of 2, Column B, Lines -1-37  
Page 2 of 3, Column B, Lines 1-45

1  
1

**ATTACHMENT A**  
**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 4**  
**12/30/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO AT&T'S 2<sup>nd</sup> REQUEST FOR PRODUCTION OF DOCUMENTS,  
REQUEST NO. 35, FILED DECEMBER 9, 2003, 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. Specifically, this information relates to the force model used to determine the force required to work the load associated with the UNE-P to UNE-L conversions. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which 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.

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DOCKET NO. 030851-TP  
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ATTACHMENT J

**ATTACHMENT A**  
**BellSouth Telecommunications, Inc.**  
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**Request for Confidential Classification**  
**Page 2 of 4**  
**12/30/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 2<sup>nd</sup> REQUEST FOR PRODUCTION OF DOCUMENTS,  
REQUEST NO. 35, FILED DECEMBER 9, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**PRODUCTION OF DOCUMENT REQUEST NO. 35**

Location

Reason

All pages – all number

1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 2  
12/31/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 2003, 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. Specifically, this information relates to revenue, and/or line counts for specific retail and wholesale services. 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.



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ATTACHMENT K

ATTACHMENT A

BellSouth Telecommunications, Inc.  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S FIRST REQUEST FOR PRODUCTION, NO.  
1, FILED DECEMBER 12, 2003, IN FLORIDA DOCKET NO. 030851-TP

**CD-ROM CONTAINING POD NO. 1, INTERROGATORY NO. 6**

<u>Column Labeled</u>	<u>Reason</u>
Columns Jan. – Nov., all pages, all rows	1

**CD-ROM CONTAINING POD No. 1, INTERROGATORY NO. 98**

Entire Document	1
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**ATTACHMENT A**  
**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 7**  
**12/31/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information contains competitive business information. The subject information includes internal methods and procedures and force sizing models. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which 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. The subject information includes BellSouth's forecasts and other confidential business information of BellSouth. Particularly, this information reflects network utilization data. If this information were disclosed publicly, it could cause harm to BellSouth in its operations and would damage the competitive interests of BellSouth. Accordingly, this information is entitled to confidential classification pursuant to Florida Statutes Section 364.183(3)(e).

**ATTACHMENT A**  
**BellSouth Telecommunications, Inc.**  
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**Request for Confidential Classification**  
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**12/31/03**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 1**

<u>Location</u>	<u>Reason</u>
All pages – all number	1

**PRODUCTION OF DOCUMENT REQUEST NO. 9**

<u>Location</u>	<u>Reason</u>
<u>Pages Labeled</u>	
Worst Case Force Projection, - All pages - all numbers	1

ATTACHMENT A  
 BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
 TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
 REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
 FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>	<u>Reason</u>
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Page Labeled

N&CS Forecasting Process (entire page)	1
Local Centers; Force & Capacity Planning (entire page)	1

Column Labeled

Page Numbers

LCSC SR Ordering	1 of 4 (all nos.)	1
Actuals (all columns so labeled)	2 of 4 (all nos.)	1
Actuals (all columns so labeled)	3 of 4 (all nos.)	1
Projected (all columns so labeled)	3 of 4 (all nos.)	1
Projected (all columns so labeled)	4 of 4 (all nos.)	1
Average 2004	4 of 4 (all nos.)	1

Location

<u>Column Labeled</u>	<u>Row Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
A	+ UNE maintenance	1 of 11	1
A	+ Resale Maintenance	1 of 11	1
A	+ UNE Provisioning	1 of 11	1
A	Total CWINS Modeled WS32 Force	1 of 11	1
C= A-B	+ UNE maintenance	1 of 11	1
C= A-B	+ Resale Maintenance	1 of 11	1
C= A-B	+ UNE Provisioning	1 of 11	1
C= A-B	Total CWINS Modeled WS32 Force	1 of 11	1

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
 TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
 REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
 FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	<u>Reason</u>
B=D+E	1
D	1
E	1
Jan – Jun (all columns so labeled)	1
Average (all columns so labeled)	1
Jul-Aug (all columns so labeled)	1
Actuals (all columns so labeled)	1
Actuals (all columns so labeled)	1
Projected (all columns so labeled)	1
Projected (all columns so labeled)	1
Average 2004	1
Actuals (all columns so labeled)	1
Actuals (all columns so labeled)	1
<u>Location</u>	
<u>Column Labeled</u>	<u>Page Numbers</u>
Projected (all columns so labeled)	7 of 11 ( all nos.)
Projected (all columns so labeled)	8 of 11 ( all nos.)
Average 2004	8 of 11 (no.)
Actuals (all columns so labeled)	9 of 11 ( all nos.)
Actuals (all columns so labeled)	10 of 11 ( all nos.)
Projected (all columns so labeled)	10 of 11 ( all nos.)

ATTACHMENT A  
BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO STAFF'S 1ST REQUESTS FOR PRODUCTION OF DOCUMENTS,  
REQUEST NOS. 1, 9, AND 10, FILED DECEMBER 12, 2003, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

**PRODUCTION OF DOCUMENT REQUEST NO. 9 (CONT.)**

<u>Location</u>		<u>Reason</u>
Projected (all columns so labeled)	11 of 11 ( all nos.)	1
Average 2004	11of 11 (no.)	1

**PRODUCTION OF DOCUMENT REQUEST NO. 10**

<u>Location</u>		<u>Reason</u>
All pages – all number		2

ATTACHMENT A

BellSouth Telecommunications, Inc.  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
SUPPLEMENTAL RESPONSE TO AT&T'S SUBPOENA AND RESPONSE TO MCI'S  
SUBPOENA ITEM NOS. 1, 2 AND 3 FILED DECEMBER 30, 2003  
IN FLORIDA DOCKET NO. 030851-TP

**SUBPOENA, ITEM NO. 1<sup>1</sup>**

Location

Page Numbers (Bates stamp #s)

Reason

000002 – 000991

Entire page

1

Column(s) Labeled

000992 – 001981

Loc Cnt

1

001986 – 002012

Clec, Line Size, Locations

1

**SUBPOENA, ITEM NO. 2**

002014 – 003079

Addr, Com, State, Class, Clec ID, DS0 Loop Count

1

**SUBPOENA, Item No 3 (labeled as AT&T's 3<sup>rd</sup> Interrogatories, Item No 125)**

Columns Labeled

Page Numbers

Reason

Customer, 2002-05, 2002-06, 2002-07, 2002-08  
2002-09, 2002-10, 2002-11, 2002-12, 2003-01,  
2003-02, 2003-03, 2003-04, 2003-05, 2003-06,  
2003-07, 2003-08, 2003-09, 2003-10, 2003-11

all pages

1

<sup>1</sup> Page numbers 001982 – 001985 do not contain any confidential, customer proprietary information.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 5**  
**01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 3<sup>rd</sup> REQUESTS FOR PRODUCTION, ITEM NOS.  
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,  
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. Specifically, this information includes salary information for BellSouth personnel and churn rates. 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. This information contains competitive business information. The subject information relates to force sizing models. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), Florida Statutes and is exempt from the Open Records Act.
3. This information concerns competitive business information. Specifically, this information reflects Agreements entered into by and between BellSouth and other companies and competitive agent program analysis. Therefore, this information should be classified as proprietary, confidential business information and is exempt from disclosure pursuant to Section 364.183 (3)(e).



ATTACHMENT A

BellSouth Telecommunications, Inc.  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 3<sup>rd</sup> REQUESTS FOR PRODUCTION, ITEM NOS.  
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,  
IN FLORIDA DOCKET NO. 030851-TP

REQUEST FOR PRODUCTION, ITEM NO. 41

<u>Location</u>	<u>Reason</u>
All pages, all numbers, all percentages	2

REQUEST FOR PRODUCTION, ITEM NO. 42

<u>Location</u>		<u>Reason</u>
<u>Heading</u>		<u>Reason</u>
All pages		2
All pages		2
<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
% of Total UNE-Ps	all pages (all nos.)	2
% IDLC	all pages (all nos.)	2
UNE-P Growth per Month	all pages (all nos.)	2
UNE-L Growth per Month	all pages (all nos.)	2
Total UNE-P Dec. 2004	all pages (all nos.)	2
Monthly UNE-P to UNE-L Conversion Plus Normal UNE-P and UNE-L Growth	all pages (all nos.)	2
Daily UNE-P to UNE-L Conversions	all pages (all nos.)	2
Daily Conversions Requiring Outside Dispatch	all pages (all nos.)	2
Daily Conversions to SLI Non-Coordinated	all pages (all nos.)	2
Daily Conversions to SLI Coordinated	all pages (all nos.)	2

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 3 of 5  
01/20/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO AT&T'S 3<sup>rd</sup> REQUESTS FOR PRODUCTION, ITEM NOS.  
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,  
IN FLORIDA DOCKET NO. 030851-TP**

**REQUEST FOR PRODUCTION, ITEM NO. 42 (CONT.)**

Location

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Daily Conversions to SL2 (Coordinated)	all pages (all nos.)	2
CO Transfer Man-Hours	all pages (all nos.)	2
Outside Transfer Man-Hours	all pages (all nos.)	2

<u>Rows Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Regional Total	bates stamp page BST000518	2
Florida Total	bates stamp page BST000522	2
Headcount	bates stamp page BST000518	2
Add Undistributed	bates stamp page BST000518	2
Supervisors 15/1	bates stamp page BST000518	2
Total Force	bates stamp page BST000518	2
Headcount	bates stamp page BST000522	2
Add Undistributed	bates stamp page BST000522	2
Supervisors 15/1	bates stamp page BST000522	2
Total Force	bates stamp page BST000522	2

**REQUEST FOR PRODUCTION, ITEM NO. 44**

Entire Document	1
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 4 of 5  
01/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 3<sup>rd</sup> REQUESTS FOR PRODUCTION, ITEM NOS.  
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,  
IN FLORIDA DOCKET NO. 030851-TP**

**REQUEST FOR PRODUCTION, ITEM NO. 48**

<u>Column Labeled</u>	<u>Page Numbers</u>	<u>Reason</u>
Jan-03	all pages (all nos.)	1
Feb-03	all pages (all nos.)	1
Mar-03	all pages (all nos.)	1
Apr-03	all pages (all nos.)	1
May-03	all pages (all nos.)	1
Jun-03	all pages (all nos.)	1
Jul-03	all pages (all nos.)	1
Aug-03	all pages (all nos.)	1

**REQUEST FOR PRODUCTION, ITEM NO. 49**

<u>Location</u>	<u>Reason</u>
Entire Document	3

**REQUEST FOR PRODUCTION, ITEM NO. 53**

<u>Location</u>	<u>Reason</u>
Entire Document	1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 5 of 5  
01/20/04

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S 3<sup>rd</sup> REQUESTS FOR PRODUCTION, ITEM NOS.  
41, 42, 44, 48, 49, 53 AND 54, FILED DECEMBER 30, 2003,  
IN FLORIDA DOCKET NO. 030851-TP

REQUEST FOR PRODUCTION, ITEM NO. 54

Location

<u>Column Labeled</u>	<u>Reason</u>
Jan-02 (all nos.)	1
Feb-02 (all nos.)	1
Mar-02 (all nos.)	1
Apr-02 (all nos.)	1
May-02 (all nos.)	1
Jun-02 (all nos.)	1
Jul-02 (all nos.)	1
Aug-02 (all nos.)	1
Sep-02 (all nos.)	1
Oct-02 (all nos.)	1
Nov-02 (all nos.)	1
Dec-02 (all nos.)	1
Jan-03 (all nos.)	1
Feb-03 (all nos.)	1
Mar-03 (all nos.)	1
Apr-03 (all nos.)	1
May-03 (all nos.)	1
Jun-03 (all nos.)	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 2**  
**1/20/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO SPRINT'S FIRST SET OF INTERROGATORIES, NO. 1, FILED DECEMBER 29,  
2003, 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. Specifically, this information relates to revenue, and/or line counts for specific retail and wholesale services. 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.

• ORDER NO. PSC-04-0193-CFO-TP  
DOCKET NO. 030851-TP  
PAGE 45

ATTACHMENT O

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
1/20/04

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE  
TO SPRINT'S FIRST SET OF INTERROGATORIES, NO. 1, FILED DECEMBER 29,  
2003, IN FLORIDA DOCKET NO. 030851-TP

ATTACHMENT 1 TO INTERROGATORY NO. 1

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
1 of 3, 2 of 3 3 of 3	Total Resold, Total Retail Total ILEC	1

ATTACHMENT 4 TO INTERROGATORY NO. 1

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
1 of 3, 2 of 3 3 of 3	Total Resold, Total Retail Total ILEC	1

ATTACHMENT 5 TO INTERROGATORY NO. 1

<u>Page No.</u>	<u>Column</u>	<u>Reason</u>
All pages	No. of Lines, No. of Locations Columns	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 2  
1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCI'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,  
IN FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. The subject information contains confidential business information related to competitive interests of BellSouth. Specifically, this information contains work force projections. Disclosure of this data would impair the competitive business of, and cause harm to, BellSouth. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida.

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DOCKET NO. 030851-TP  
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ATTACHMENT P

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 2 of 2  
1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO MCI'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,  
IN FLORIDA DOCKET NO. 030851-TP**

**POD NO. 2, (Document responsive to Interrogatory No. 208)**

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Entire Document		1



ORDER NO. PSC-04-0193-CFO-TP  
DOCKET NO. 030851-TP  
PAGE 48

ATTACHMENT Q

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 2**  
**1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO SPRINT'S FIRST REQUEST FOR PRODUCTION (NOs. 1,2,3,9,11,12,20 and 25)  
FILED JANUARY 5, 2004, IN FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. The subject information contains confidential business information related to the competitive interests of BellSouth. Disclosure of this data would impair the competitive business of, and cause harm to, BellSouth. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida.

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DOCKET NO. 030851-TP  
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ATTACHMENT Q

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 2 of 2**  
**1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO SPRINT'S FIRST REQUEST FOR PRODUCTION (NOs. 1,2,3,9,11,12,20 and 25)  
FILED JANUARY 5, 2004, IN FLORIDA DOCKET NO. 030851-TP**

**PROPRIETARY CD ROM (POD NOs. 1,2,3,9,11,12,20 and 25)**

<u>Location</u>	<u>Reason</u>
Entire CD	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 2  
1/29/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S SECOND SET OF INTERROGATORIES,  
ITEM NOS. 220 AND 221 FILED JANUARY 8, 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. Specifically, this information relates to revenue, and/or line counts for specific retail and wholesale services. 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.

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DOCKET NO. 030851-TP  
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ATTACHMENT R

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 2  
1/29/04

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO MCI'S SECOND SET OF INTERROGATORIES,  
ITEM NOS. 220 AND 221 FILED JANUARY 8, 2004, IN FLORIDA DOCKET NO.  
030851-TP

INTERROGATORY NO. 220

<u>Location</u>	<u>Reason</u>
Retail Column in Response	1

INTERROGATORY NO. 221 (Attachment No. 1)

<u>Location</u>	<u>Reason</u>
Retail Column, all pages	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
2/3/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO SPRINT'S FOURTH SET OF INTERROGATORIES, ITEM NO. 11 FILED  
JANUARY 13, 2004, IN FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

- A. This information reflects vendor specific prices negotiated by BellSouth. Public disclosure of this information would impair BellSouth's ability to contract for goods and services on favorable terms. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d) Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 1**  
**2/12/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES,  
ATTACHMENT TO ITEM NO. 66 FILED JANUARY 22, 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.

Location

Reason

**Entire Document**

**1**

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
2/12/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL DIRECT  
TESTIMONY OF JAMES W. STEGEMAN, ATTACHED REVISED BACE MODEL  
FILED JANUARY 22, 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. Specifically, this information relates to revenue, and line counts for specific retail and wholesale services. 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.

Location

Reason

**BACE MODEL ON CD**  
Entire CD

1

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



ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S FOURTH  
SUPPLEMENTAL RESPONSES TO MCIMETRO ACCESS TRANSMISSION  
SERVICES, LLC AND MCI WORLCOM COMMUNICATONS, INC.'S FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) - ATTACHMENTS TO  
INTERROGATORY NOS. 98, 147 AND 149, FILED JANUARY 27, 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.

Location

Reason

**POD No. 1 – Attachment to Interrogatory No. 98**

Bates Stamped page nos. BST000002-BST000930  
Entire document

1

**POD No. 1 – Attachment to Interrogatory No. 147**

Bates Stamped page nos. BST004269-BST004421  
Entire Document

1

**POD No. 1 – Attachment to Interrogatory No. 149**

Bates Stamped page no. BST004423

1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
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2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER, W. KEITH MILNER AND  
EXHIBIT WKM-5, KENNETH L. AINSWORTH, PAMELA A. TIPTON AND DR.  
DEBRA J. ARON FILED JANUARY 28, 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. This information is proprietary to BellSouth 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.

<u>Location</u>	<u>Reason</u>
<b>Surrebuttal of Alphonso J. Varner</b>	
Page 45, lines 23-24	2
<b>Surrebuttal of W. Keith Milner</b>	
Page 7, line 21	2
Page 8, lines 1, 3, 12, 19-20	2
Page 9, lines 16, 23	2

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BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
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2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S  
SURREBUTTAL TESTIMONY OF ALPHONSO J. VARNER, W. KEITH MILNER AND  
EXHIBIT WKM-5, KENNETH L. AINSWORTH, PAMELA A. TIPTON AND DR.  
DEBRA J. ARON FILED JANUARY 28, 2004, IN FLORIDA DOCKET NO. 030851-TP**

<u>Location</u>	<u>Reason</u>
<b>Surrebuttal of W. Keith Milner</b>	
Page 10, lines 3-5	2
Page 10, lines 8, 10, 23-Page 11, line 1	2
<b>WKM-5</b>	
Entire document	2
<b>Surrebuttal of Kenneth I. Ainsworth</b>	
Page 12, line 23	2
Page 13, lines 5-8, 10-13	2
Page 31, line 20	2
Page 33, line 3-6, 12-14, 17, 21-25	2
<b>Surrebuttal of Pamela A. Tipton</b>	
Page 8, line 5	2
Page 14, lines 19-20	2
Page 17, line 17	2
<b>Surrebuttal of Dr. Debra J. Aron</b>	
Page 58, line 4	1
Page 75, lines 20, 22-23	1
Page 87, lines 16, 18	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**Page 1 of 1**  
**2/17/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ATTACHMENTS TO  
BELLSOUTH'S RESPONSES TO STAFF'S FIFTH INTERROGATORIES, ITEM NOS.  
89 AND 90, FILED FEBRUARY 3, 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.

<u>Location</u>	<u>Reason</u>
<b>Attachment 89-1</b>	
Columns B-C, lines 1-13	1
<b>Attachment 89-2</b>	
Columns B-C, lines 1-13	1
<b>Attachment 90-1</b>	
Columns B-C, lines 1-7	1
<b>Attachment 90-2</b>	
Columns B-C, lines 1-7	1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification  
Page 1 of 1  
2/17/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REVISED EXHIBITS PAT-5  
AND PAT-7 OF THE DIRECT TESTIMONY OF PAMELA A. TIPTON, FILED  
JANUARY 30, 2004, IN FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information is proprietary to BellSouth 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.

<u>Location</u>	<u>Reason</u>
<b>EXHIBIT PAT-5</b>	
Page 1 of 2, Column B, Lines 2-51	1
Page 2 of 3, Column B, Lines 1-33	1
<b>EXHIBIT PAT-7</b>	
All names identified	1

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ATTACHMENT Z

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification**

**2/19/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S FIRST  
SUPPLEMENTAL RESPONSES TO STAFF'S THIRD REQUESTS FOR  
PRODUCTION, ATTACHMENT TO ITEM NO. 20 FILED FEBRUARY 13, 2004, IN  
FLORIDA DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information reflects competitive business information which BellSouth uses in conducting business. Specifically, it includes information on the operations of certain systems and processes within BellSouth. Public disclosure of this information could impair BellSouth's ability to compete in the marketplace. This information is valuable and BellSouth strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d) Florida Statutes and is exempt from the Open Records Act.

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ATTACHMENT AA

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 030851-TP  
Request for Confidential Classification**

2/19/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S FIRST  
SUPPLEMENTAL RESPONSES TO STAFF'S THIRD REQUESTS FOR  
PRODUCTION, ATTACHMENT TO ITEM NO. 20 FILED FEBRUARY 13, 2004, IN  
FLORIDA DOCKET NO. 030851-TP**

**Requests for Production – Attachment to Item No. 20**

<u>Location</u>	<u>Reason</u>
Entire Document	1