

ORIGINAL

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March 2, 2004

RECEIVED-150
MAR-2 PM 4:41
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. 030852-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Supplemental Responses to Florida Public Commission Staff's Third Set of Interrogatories, Item Nos. 39, 40, 46 and 47; and Fourth Set of Interrogatories Nos. 62, 63, 64, 65, 66, 69, 72 and 73, 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 (e)

Enclosure

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

DN 03103-04 REQ
03104-04 REDACTED
03105-04 CONFIDENTIAL
Nos. 39, 40, 46, 47

431

RECEIVED & FILED

KUN

FPSC-BUREAU OF RECORDS

DNs 03106-04 REQ
03107-04 REDACTED
03108-04 CONFIDENTIAL
Nos. 62-66, 69, 72-73

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 2nd day of March 2004 to the following:

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Nancy B. White *CB*

(+) 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. 030852-TP
Triennial UNE review: Location Specific-Review)
For DS1, DS3, and Dark Fiber Loops and) Filed: March 2, 2004
Route-Specific Review for DS1, DS3, and Dark)
Fiber Transport)
_____)

**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 24, 2004, BellSouth filed supplemental responses to Staff's Third Set of Interrogatories (Nos. 27-47) and Third Request for Production of Documents (Nos. 24-37). On this same day, BellSouth filed a Notice of Intent pertaining to the supplemental responses to Interrogatory Nos. 39, 40, 46 and 47 which contain confidential information that is proprietary to BellSouth.

2. BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's supplemental responses to Interrogatory Nos. 39, 40, 46 and 47 contain confidential information that is proprietary to BellSouth, as well as customer specific information. A more specific description of this information is contained in Attachment A.

3. 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

DOCUMENT NUMBER-DATE

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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.

4. 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.

5. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.

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

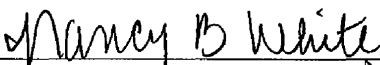
7. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

8. 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.

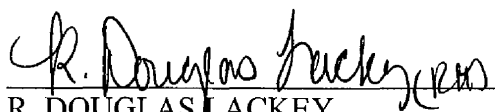
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 2nd day of March, 2004

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 030852-TP
Request for Confidential Classification
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3/2/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S
SUPPLEMENTAL RESPONSE TO STAFF'S THIRD SET OF INTERROGATORIES
(NOS. 39, 40, 46 AND 47) FILED FEBRUARY 24, 2004, IN
FLORIDA DOCKET NO. 030852-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 contains customer specific information. 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.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030852-TP
Request for Confidential Classification
Page 2 of 2
3/2/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
SUPPLEMENTAL RESPONSE TO STAFF'S THIRD SET OF INTERROGATORIES
(NOS. 39, 40, 46 AND 47) FILED FEBRUARY 24, 2004, IN
FLORIDA DOCKET NO. 030852-TP**

<u>Location</u>	<u>Reason</u>
<u>Interrogatory No. 39</u>	
Pgs 2-5, Entire Page	1 and 2
<u>Interrogatory No. 40</u>	
Pgs 2-9, Entire Page	1 and 2
<u>Interrogatory No. 46</u>	
Pgs 1-2, Parent Column	1 and 2
<u>Interrogatory No. 47</u>	
Pgs 1-11, Carrier Column	1 and 2