

**ORIGINAL REDACTED**

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC DOCKET 030300-TP  
Request for Confidential Classification**

**Page 1**

**5/5/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO  
FPTA'S FIRST SET OF INTERROGATORIES, NO. 9 AND FIRST REQUEST FOR  
PRODUCTION, NOS. 2 AND 9 FILED MAY 3, 2004, IN FPSC DOCKET 030300-TP**

**TWO REDACTED COPIES**

DOCUMENT NUMBER-DATE

05267 MAY-5 3

FPSC-COMMISSION CLERK

**REQUEST:** State, in as much detail as you intend to provide in this matter, all facts, which support BellSouth's Second Affirmative Defense in you Answer filed in this docket. As part of your response, identify all documents discussed, referred to, or utilized in making your response.

**RESPONSE:** From January to May 1999, BellSouth and the FPTA engaged in confidential settlement negotiations. As a result of such negotiations, \*\*\* BEGIN  
CONFIDENTIAL \*\*\*

\*\*\* END CONFIDENTIAL \*\*\*

In the event that this Commission ordered refunds (which the Commission should not do under any circumstances) based upon the FPTA's erroneous theory that PTAS rates should have been lower in the past, then BellSouth would assert its right to adjust or offset concessions it made to PSPs that received the benefit of other plans that were modified in connection with the parties' confidential negotiations.

BellSouth also directs FPTA to the illustration provided in response to Interrogatory No. 8 to demonstrate the application of any offsets.

**RESPONSE PROVIDED BY:** Nancy Sims  
Meredith Mays

**ENTIRE PAGE PROPRIETARY**

**BATES RANGE BST000005 – BST000110**

**BATES RANGE BST000116 – BST000126**

**BATES RANGE BST000128 – BST000138**