

JAMES MEZA III  
Senior Regulatory Counsel  
BellSouth Telecommunications, Inc.  
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(404) 335-0769

November 4, 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-FPSC  
04 NOV -4 PM 4:30  
COMMISSION  
CLERK

Re: Docket No.: 040353-TP Supra "PreferredPack"

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*James Meza III*  
James Meza III

Enclosures

- CMP \_\_\_\_\_ cc: All Parties of Record
- COM \_\_\_\_\_ Marshall M. Criser III
- CTR \_\_\_\_\_ R. Douglas Lackey
- ECR \_\_\_\_\_ Nancy B. White
- GCL 1
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SEC 1
- OTH 1 cert  
records

(x-ref. 11967-04) Taylor - 11096-04  
(x-ref. 11971-04) Pitofsty - 11097-04  
(x-ref. 11969-04) Shell - 11098-04

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

RECEIVED & FILED

*DM*

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11920 NOV-4 04

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 040353-TP**

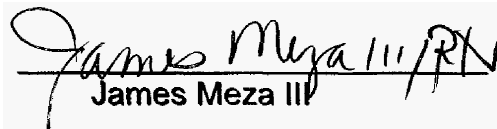
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail and Electronic Mail this 4th day of November, 2004 to the following:

Adam Teitzman  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
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(\*) Signed Protective Agreement

  
James Meza III

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re:	)	
	)	
Petition of Supra Telecommunications	)	Docket No. 040353-TP
And Information Systems, Inc. to Review	)	
And Cancel BellSouth's Promotional Offering	)	Filed: November 4, 2004
Tarriffs Offered in Conjunction With its New	)	
Flat Rate Service Known as PreferredPack	)	

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**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 this Request for Specified Confidential Classification.

1. On October 14, 2004, BellSouth filed the Direct Testimony of William E. Taylor, Ph.D. and exhibit WET-2, the Direct Testimony of W. Bernard Shell and exhibit WBS-1; and the Direct Testimony of Robert Pitofsky. The referenced testimony and exhibits contain confidential business information.

2. Because these testimonies and exhibits contain confidential business, proprietary information, BellSouth filed a Notice of Intent on October 14, 2004. A more specific description of this information is provided in Attachment A. These items 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.

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

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

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

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 4<sup>th</sup> day of November, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



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NANCY B. WHITE

c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558



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R. DOUGLAS LACKEY

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BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S DIRECT TESTIMONY OF WILLIAM E. TAYLOR, PH.D. AND EXHIBIT WET-2, DIRECT TESTIMONY OF W. BERNARD SHELL AND EXHIBITS WBS-1 AND THE DIRECT TESTIMONY OF ROBERT PITOFSKY FILED OCTOBER 14, 2004 IN FLORIDA DOCKET NO. 040353-TP**

**Explanation of Proprietary Information**

- 1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. The documents contain actual unit cost information for discrete cost elements as well as specific pricing and marketing data. Public disclosure of this information would provide BellSouth's competitors with an advantage in that they would know the price or rate below which BellSouth could not provide the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available 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, Florida Statutes and is exempt from the Open Records Act.

<u>Location</u>	<u>Reason</u>
<b><u>Direct Testimony of William E. Taylor, Ph.D.</u></b>	
Pages 15, 16, 23, 24, 25, 27, 28	1
<b><u>Exhibit WET-2</u></b>	
Column B, lines 5-14	1
Column D, lines 5-12	1
<b><u>Direct Testimony of W. Bernard Shell</u></b>	
Page 4, line 22	1
Page 5, lines 10, 17, 18, fn	1
Page 6, lines 4, 11, 18	1
Page 7, lines 5, 7-9, 11, 13-15, 22-24	1
Page 8, lines 9-10	1

ATTACHMENT A

BellSouth Telecommunications, Inc.  
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Request for Confidential Classification  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S DIRECT  
TESTIMONY OF WILLIAM E. TAYLOR, PH.D. AND EXHIBIT WET-2, DIRECT  
TESTIMONY OF W. BERNARD SHELL AND EXHIBITS WBS-1 AND THE DIRECT  
TESTIMONY OF ROBERT PITOFSKY FILED OCTOBER 14, 2004  
IN FLORIDA DOCKET NO. 040353-TP

<u>Location</u>	<u>Reason</u>
<b><u>Direct Testimony of W. Bernard Shell (cont.)</u></b>	
Page 9, lines 5, 16, 18-20	1
Page 10, lines 1-2, 10-12, 22-23	1
<b><u>Exhibit WBS-1</u></b>	
Line 1, Columns G-I	1
Lines 2-3, Columns B-I	1
Line 4, Column B	1
Line 5, Columns B-E	1
Lines 10-13, Columns A-I	1
Line 15, Columns A-I	1
<b><u>Direct Testimony of Robert Pitofsky</u></b>	
Page 9, lines 4, 6	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 040353-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S DIRECT  
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TESTIMONY OF ROBERT PITOFSKY FILED OCTOBER 14, 2004  
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**2 COPIES OF PUBLIC DISCLOSURE DOCUMENT**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 040353-TP  
Request for Confidential Classification  
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11/4/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S DIRECT  
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**PROPRIETARY COPY**