

JAMES MEZA III
Senior Regulatory Counsel
BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0769

December 1, 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 DEC -1 PM 3:51
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 *IRN*

- CMP _____ Enclosures
- COM _____
- CTR _____ cc: All Parties of Record
- ECR _____ Marshall M. Criser III
- GCL J R. Douglas Lackey
- OPC _____ Nancy B. White
- MMS _____
- RCA _____
- SCR _____
- SEC I
- OTH I *cent records*

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on
FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DN 12779-04. 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.
(x-ref. 12098-04)

DOCUMENT NUMBER-DATE
12778 DEC -1 04
FPSC-COMMISSION CLERK

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

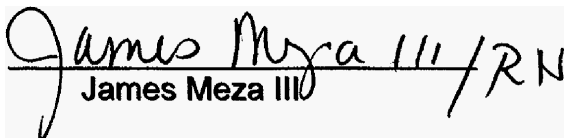
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via First Class U.S. Mail and Electronic Mail this 1st day of December, 2004 to the following:

Adam Teitzman
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
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Tallahassee, FL 32399-0850
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ateitzma@psc.state.fl.us

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Supra Telecommunications & Info Sys
Legal Department
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Information Systems, Inc.
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Koger Center - Ellis Building
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ashelfer@stis.com

(*) Signed Protective Agreement


James Meza III / RN

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: December 1, 2004
Tarriffs Offered in Conjunction With its New)
Flat Rate Service Known as PreferredPack)
_____)

**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 November 10, 2004, BellSouth filed its Response to Staff's Third Set of Interrogatories (Nos. 26-30), portions of which contain confidential business information.
2. In order for Staff to take possession of BellSouth's responses, on November 10, 2004, BellSouth also filed a Notice of Intent for the portions of BellSouth's Response to Staff's Third Set of Interrogatories, No. 29 that contain confidential business, proprietary information. A more specific description of this information is provided in Attachment A. These items should be classified as proprietary, confidential marketing 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.

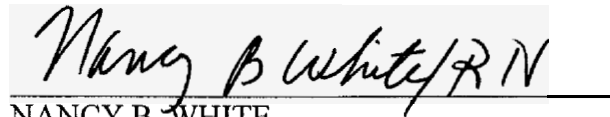
5. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this private financial information as confidential in all requests, and this information has not been generally disclosed.

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.

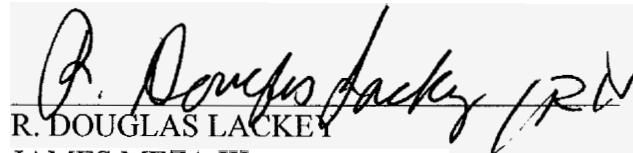
Respectfully submitted this 1st day of December, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



Nancy B White/RN

NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street, Suite 400
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(305) 347-5558



R. Douglas Lackey/RN

R. DOUGLAS LACKEY
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ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
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12/1/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO STAFF'S THIRD SET OF INTERROGATORIES, NO. 29, FILED NOVEMBER 10,
2004, IN FLORIDA DOCKET NO. 040353-TP**

Explanation of Proprietary Information

1. This information contains confidential marketing 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 marketing information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

Location

Reason

Interrogatory No. 29

Subpart (a) of RESPONSE:

1

ATTACHMENT B

BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
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12/1/04

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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2004, IN FLORIDA DOCKET NO. 040353-TP**

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

REDACTED

REQUEST: Please provide on a monthly basis the number of new subscriptions

- a. to each, the PreferredPack Plan and BellSouth's Complete Choice service, between January through April of 2004, and
- b. of those, state the number of new subscriptions taken by BellSouth's business office.

OBJECTION: BellSouth objects to this request on the grounds that it is irrelevant and not likely to lead to the discovery of admissible evidence because BellSouth's Complete Choice service is not at issue in this proceeding. Further, BellSouth objects on the grounds that the phrase "BellSouth's business office" is vague and ambiguous.

RESPONSE: In responding to this request, BellSouth presumes that new subscriptions means new customers. It should also be noted that, per the Interrogatory, the numbers reflected below for the PreferredPack service represent the total number of customers that signed up for PreferredPack in Florida service for the time period in question.

A.

Florida	2004			
	Jan	Feb	Mar	Apr
Complete Choice	██████	██████	██████	██████
PreferredPack (BPP)	██████	██████	██████	██████

B. Without clarification, BellSouth is unable to provide a response to this Interrogatory without a better understanding of what is meant by "BellSouth Business Office."

REDACTED

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PreferredPack (BPP)	██████	██████	██████	██████

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ATTACHMENT C

BellSouth Telecommunications, Inc.
FPSC Docket No. 040353-TP
Request for Confidential Classification
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PROPRIETARY COPY