JAMES MEZA III Senior Regulatory Counsel

(____)

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0769

January 31, 2005

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: 041114-TP – Complaint of XO Florida, Inc. Against BellSouth Telecommunications, Inc. for Refusal to Convert Circuits to UNEs and for Expedited Processing

Dear Ms. Bayó:

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

games Mena III/RN James Meza III

Enclosures

cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White

CERTIFICATE OF SERVICE DOCKET NO. 041114-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and Federal Express this 31st day of January, 2005 to the following:

Jason Rojas
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6179
irojas@psc.state.fl.us

Vicki Gordon Kaufman (+)
McWhirter Reeves McGlothlin
Davidson Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 222-2525
Fax. No. (850) 222-5606
vkaufman@mac-law.com
Represents XO

Dana Shaffer (+)
XO Florida, Inc.
VP, Regulatory Counsel
105 Molloy Street, Ste. 300
Nashville, TN 37201
Tel. No. (615) 777-7700
Fax. No. (615) 850-0343
dana.shaffer@xo.com

James Mezallil

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of XO Florida, Inc.)	
Against BellSouth Telecommunications,)	Docket No. 041114-TP
Inc. for Refusal to Convert Circuits to)	-
UNEs and for Expedited Processing)	Filed: January 31, 2005

BELLSOUTH TELECOMMUNICATIONS, INC.'S REPLACEMENT FOR REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification.

- 1. On December 15, 2004, BellSouth served its proprietary responses to XO's First Set of Interrogatories (Nos. 1-8) and First Request for Production of Documents (Nos. 1-7).
- 2. In order for Staff to take possession of BellSouth's responses to XO, on December 16, 2004 BellSouth filed a Notice of Intent, in particular, for BellSouth's Response to Interrogatory No. 5 and the documents provided in BellSouth's Response to XO's First Request for Production, Item Nos. 1 and 7, which contains confidential business, proprietary information. 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. On January 6 and January 10, 2005, BellSouth filed its Request for Confidential Classification and Replacement Request to describe exactly what portions were proprietary.

BellSouth hereby files a Replacement Request for Confidential Classification to further, and more exactly, describe what is proprietary.

- 4. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.
- 5. Attachment C to BellSouth's Request for Confidential Classification is a proprietary highlighted copy of the confidential information.
- 6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.
- 7. 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 31st day of January 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Nancy B. White c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, Florida 32301

(305) 347-5558

R. Douglas Lackey

James Meza III

BellSouth Center – Suite 4300 675 West Peachtree Street, N.E.

Atlanta, Georgia 30375

(404) 335-0769

#569749

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 1 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-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 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. 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. 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.
- 3. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, BellSouth's internal procedures for *Implementation of Single Network Element-Switch As-Is (SNE-SAI)*; Single Network Element SPA to UNE (SNESAI) Conversion Marketing Service Description provide description, service restrictions, appropriate forms, service order issuance requirements, installation intervals, repair procedures, etc. that are proprietary and confidential to BellSouth as it describes BellSouth's internal operations. Additionally, the information contains forecasted demand data and BellSouth's strategic schedule of deployment which competitors could use to gain an economic advantage.

Furthermore, this information has been prepared at great cost to BellSouth and therefore, others should not be permitted to gain the noncompetitive benefit from not having to develop these instructions and materials themselves. And, job aids have historically been protected by the Florida Public Service Commission. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 2 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Location	Reason
<u>INTERROGATORY NO. 5</u>	
Lines 4 and 5 of Response	1 and 2
<u>POD NO. 1</u>	
Document GG (Bates XO1STPODNO1000512)	
Columns B-L, Lines 3-35	1
Document II	
XO1stPODNO1000553, lines 6-28	3
XO1stPODNO1000554, lines 6-44	3 3 3 3 3
XO1stPODNO1000555, lines 6-30	3
XO1stPODNO1000556, lines 6-42	3
XO1stPODNO1000557, lines 6-27	3
XO1stPODNO1000558, lines 6-18	3
XO1stPODNO1000560, lines 2-26	3
XO1stPODNO1000561, lines 2-36	3
XO1stPODNO1000562, lines 2-14	3
XO1stPODNO1000563, lines 2-33	3
XO1stPODNO1000564, lines 2-13	3
XO1stPODNO1000565, lines 2-40	3
XO1stPODNO1000566, lines 2-34	3
XO1stPODNO1000567, lines 2-28	3 3 3 3 3 3 3 3
XO1stPODNO1000568, lines 2-31	
XO1stPODNO1000569, lines 2-22	3

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 3 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Document II (cont)

XO1stPODNO1000570, lines 2-10	3
XO1stPODNO1000571, lines 2-29	3
XO1stPODNO1000572, lines 2-9	3
XO1stPODNO1000573, lines 2-27	3
XO1stPODNO1000574, lines 2-25	3
XO1stPODNO1000575, lines 2-15	3
XO1stPODNO1000576, lines 6-33	3
XO1stPODNO1000577, lines 2-25	3
XO1stPODNO1000578, lines 2-24	3
XO1stPODNO1000579, lines 5-33	3

DOCUMENT JJ

XO1stPODNO1000581, lines 2-41	3	
XO1stPODNO1000582, lines 2-24	3	
XO1stPODNO1000583, lines 2-8	3	
XO1stPODNO1000584, lines 2-52	3	
XO1stPODNO1000585, lines 2-51	3	
XO1stPODNO1000586, lines 2-29	3	
XO1stPODNO1000587, lines 2-69	3	
XO1stPODNO1000588, lines 2-71	3	
XO1stPODNO1000589, lines 2-26	3	

POD NO. 7

Entire Document

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 1 of 1 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of XO Florida, Inc.)	•
Against BellSouth Telecommunications,)	Docket No. 041114-TP
Inc. for Refusal to Convert Circuits to)	
UNEs and for Expedited Processing)	Filed: January 31, 2005
	Ý	

BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification.

- 1. On December 15, 2004, BellSouth served its proprietary responses to XO's First Set of Interrogatories (Nos. 1-8) and First Request for Production of Documents (Nos. 1-7).
- 2. In order for Staff to take possession of BellSouth's responses to XO, on December 16, 2004 BellSouth filed a Notice of Intent, in particular, for BellSouth's Response to Interrogatory No. 5 and the documents provided in BellSouth's Response to XO's First Request for Production, Item Nos. 1 and 7, which contains confidential business, proprietary information. 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. On January 6 and January 10, 2005, BellSouth filed its Request for Confidential Classification and Replacement Request to describe exactly what portions were proprietary.

BellSouth hereby files a Replacement Request for Confidential Classification to further, and more exactly, describe what is proprietary.

- 4. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.
- 5. Attachment C to BellSouth's Request for Confidential Classification is a proprietary highlighted copy of the confidential information.
- 6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.
- 7. 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 31st day of January 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

R. Douglas Lackey
James Meza III
BellSouth Center – Suite 4300
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0769

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 1 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-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 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. 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. 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.
- 3. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, BellSouth's internal procedures for *Implementation of Single Network Element-Switch As-Is (SNE-SAI)*; Single Network Element SPA to UNE (SNESAI) Conversion Marketing Service Description These documents provide description, service restrictions, appropriate forms, service order issuance requirements, installation intervals, repair procedures, etc. Additionally, the information contains forecasted demand data and BellSouth's strategic schedule of deployment which competitors could use to gain an economic advantage.

Furthermore, this information has been prepared at great cost to BellSouth and therefore, others should not be permitted to gain the noncompetitive benefit from not having to develop these instructions and materials themselves. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 2 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Location	Reason
INTERROGATORY NO. 5	
Lines 4 and 5 of Response	1 and 2
<u>POD NO. 1</u>	
Document GG (Bates XO1STPODNO1000512)	
Columns B-L, Lines 3-35	1
Document II	
XO1stPODNO1000553, lines 6-28 XO1stPODNO1000554, lines 6-44 XO1stPODNO1000555, lines 6-30 XO1stPODNO1000556, lines 6-42 XO1stPODNO1000557, lines 6-27 XO1stPODNO1000558, lines 6-18 XO1stPODNO1000560, lines 2-26 XO1stPODNO1000561, lines 2-36 XO1stPODNO1000562, lines 2-14 XO1stPODNO1000563, lines 2-33 XO1stPODNO1000564, lines 2-13 XO1stPODNO1000565, lines 2-40 XO1stPODNO1000566, lines 2-34 XO1stPODNO1000567, lines 2-28 XO1stPODNO1000568, lines 2-31 XO1stPODNO1000569, lines 2-22	3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP **Request for Confidential Classification** Page 3 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Document II (cont)

XO1stPODNO1000570, lines 2-10	3
XO1stPODNO1000571, lines 2-29	3
XO1stPODNO1000572, lines 2-9	3
XO1stPODNO1000573, lines 2-27	3
XO1stPODNO1000574, lines 2-25	3
XO1stPODNO1000575, lines 2-15	3
XO1stPODNO1000576, lines 6-33	3
XO1stPODNO1000577, lines 2-25	3
XO1stPODNO1000578, lines 2-24	3
XO1stPODNO1000579, lines 5-33	3
DOCUMENT JJ	

XO1stPODNO1000581, lines 2-41	3
XO1stPODNO1000582, lines 2-24	3
XO1stPODNO1000583, lines 2-8	3
XO1stPODNO1000584, lines 2-52	3
XO1stPODNO1000585, lines 2-51	3
XO1stPODNO1000586, lines 2-29	3
XO1stPODNO1000587, lines 2-69	3
XO1stPODNO1000588, lines 2-71	3
XO1stPODNO1000589, lines 2-26	3

POD NO. 7

Entire Document

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 1 of 1 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1 DOCUMENT "GG"

PUBLIC DISCLOSURE DOCUMENT

				Special Access	(8PA) to UNE P	roject Mana	Special Access (SPA) to UNE Project Management Conversion	lon				
	A	ВС	A	lu	II.	J	, I	H	, 	¥	Ļ	. 2
11	* CONTRACTOR CONTRACTO	THE TRANSPORTER PROPERTY OF THE PROPERTY OF TH	Desy Det. 1 Osets 1 ZSUESTREAMSTERNOS	AND PASSESSESSESSESSESSESSESSESSESSESSESSESSE	um.	Contact Contac	min Programme	inie	EELs and Access to Cents per hr.	UMB Cost Study Test Costs	1	8
W-	Sel up to per alab per emporment (records per-deroking marting & salammen legest from explores) Charge he such circuit that is											
רוי ל												
3,	6 BOCADS - Very Access blook for pretting orders & and save take par order and save take par order to the following of the property of the pro											-
∞ e <	Verleib order and PON High BOOK INSER REAL PARTY OF THE P											
? =	Maria Natary of before this has fa											
₹ <i>1</i> 5 ₹	Manual harding of orders that him as and of PCOPE to be beneficially for CHOTS are redistioned for POX, POC. Out also and CEA or walls COPEN! Vallet completely of disciplines and new											
F 70 :	Toda po Charles						<i>'</i>					- "
2 5	OKTAFORMENTER MICE				. •							
80	Mennys putting all amont, valetas fistum vita sava bevittes, CRO-4 CO									:		
ਜੋ ਰੋਜ	20 Review Take design for the descended State manages and Chillips sump Landship freese with the LESO 2.2 SEET (Institute) for CD							• •				
n a	FIET (Testing) In ACAC. Project Manage to See broagh of each Confess Integral WFA, 1902, 800A63 to esture complete.			٠								
भ न	State to Chercal											
4 5	<u> </u>							e e				
ÿ	Laxed of the research is frequency in											
8	• ; •											
	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,											

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1 DOCUMENT "II"

PUBLIC DISCLOSURE DOCUMENT

VO1-EDADMA1000EEC

```
/ IMPLEMENTATION GUIDE
  2 Single Network Element-Switch As Is (SNE-SAI)
 3 CPATS #: N/A
4 DESCRIPTION: Conversion procedures for Single Network Elements
  5 Keywords: SNE-SAI, Single Network Elements, Conversions
  7
  8
  9
  10
     11
     12
     13
     14
     15
    -16
     17
     18
     19
     20
     21
      22
      23
24
25
26
27
æ
29
    Issue Date: 3/13/02
                                                 2
30 Revision Date: 02/03/03
                                               Notice
31
                                     Not For Use Or Disclosure Outside
30
                                  BellSouth Except Under Written Agreement
```

1 IMPLEMENTATION GUIDE 2 Single Network Element-Switch As Is (SNE-SAI) 3 CPATS#: N/A -- 4 DESCRIPTION: Conversion procedures for Single Network Elements 5 Keywords: SNE-SAI, Single Network Elements, Conversions 45 Issue Date: 3/13/02 3 -K. Revision Date: 02/03/03



1 IMPLEMENTATION GUIDE 2 Single Network Element-Switch As Is (SNE-SAI) 3 CPATS #: N/A 4 DESCRIPTION: Conversion procedures for Single Network Elements 5 Keywords: SNE-SAI, Single Network Elements, Conversions 10 u 29 **3**0 31 32 33 34 37 38 39 4D 41 42 Issue Date: 3/13/02 5 43 Revision Date: 02/03/03 Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

```
I IMPLEMENTATION GUIDE
2 Single Network Element-Switch As Is (SNE-SAI)
3 CPATS #: N/A
A DESCRIPTION: Conversion procedures for Single Network Elements
5 Keywords: SNE-SAI, Single Network Elements, Conversions
 10
 11
  12
   18
   19
   20
   21
   22
23
مال
27
```

28 Issue Date: 3/13/02 29 Revision Date: 02/03/03

6

303132

IMPLEMENTATION GUIDE
Single Network Element-Switch As Is (SNE-SAI)
CPATS #: N/A
DESCRIPTION: Conversion procedures for Single Network Elements
Keywords: SNE-SAI, Single Network Elements, Conversions

6

1

15

19 Issue Date: 3/13/02 36 Revision Date: 02/03/03

21

22.

18 :

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

7

•

Single Network Element SPA to UNE (SNESAI) Conversion Marketing Service Description Version 10 November 13, 2002

Document Prepared by:

રકાર્યું છે. જે મું જેવા છે.

Michael Hurst, Product Manager 205-977-1223

Issue Date: 3/13/02 Revision Date: 07/01/02 8

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement 4.

29 Issue Date: 3/13/02 Revision Date: 07/01/02

9

37 Issue Date: 3/13/02 38 Revision Date: 07/01/02

39 40 41 10

•

15

16

17

7

9

11 12 13

Issue Date: 3/13/02 Revision Date: 07/01/02

11

:		
		- 2 ·

ATTACHMENT 1 21 0 T 34 Issue Date: 3/13/02 35 Revision Date: 07/01/02 Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement.

Issue Date: 3/13/02 Revision Date: 07/01/02

13

117

41 Issue Date: 3/13/02 42 Revision Date: 07/01/02

14

43

44

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

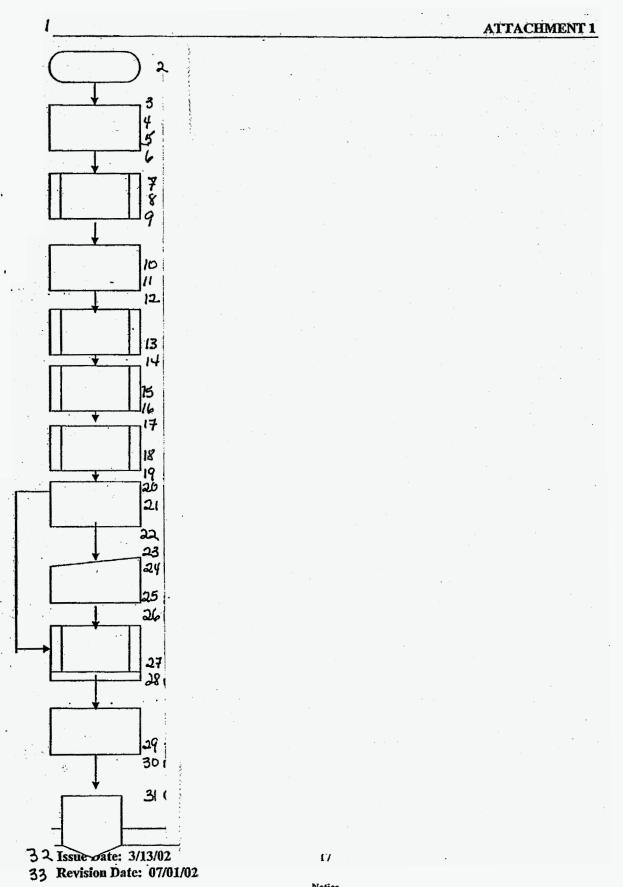
VA4±48ABHA4AAAFA

34 Issue Date: 3/13/02 35 Revision Date: 07/01/02

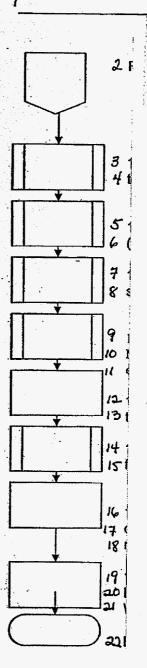
Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

> 39 Issue Date: 3/13/02 30 Revision Date: 07/01/02

3!

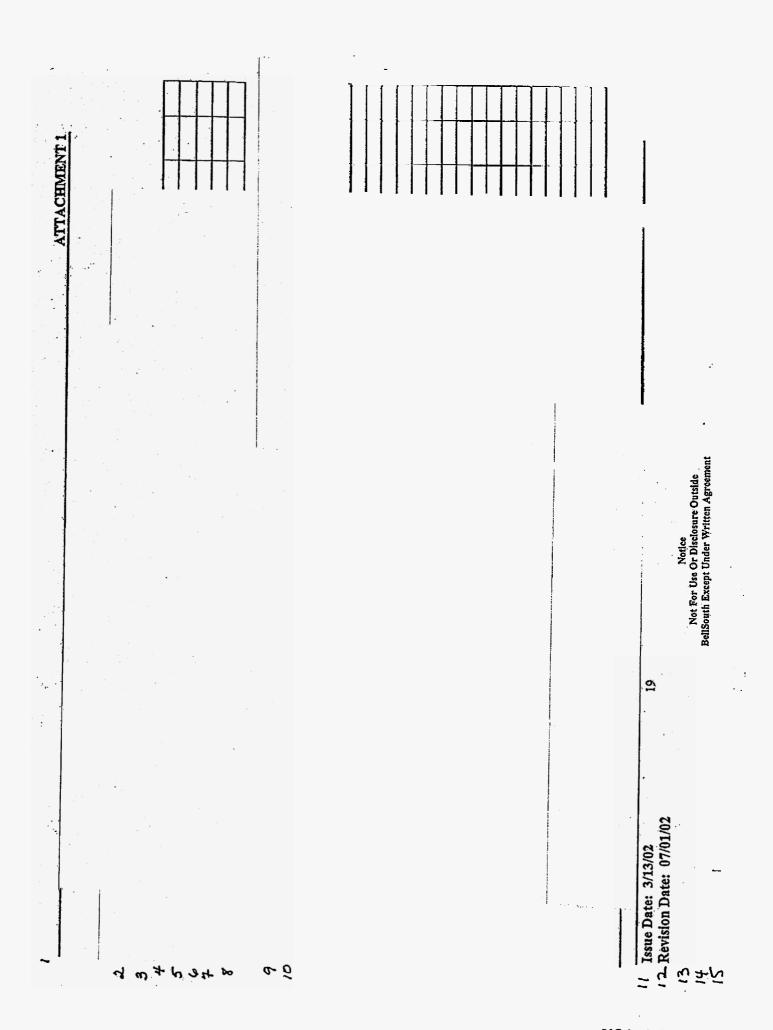


35



23 Issue Date: 3/13/02 24 Revision Date: 07/01/02

18



24 27 28

13

14 17 18

19

20

ચ

22

23

. 24

25

29

30 Issue Date: 3/13/02

31 Revision Date: 02/03/03

32 33 34 Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

) -

l

10 Issue Date: 3/13/02

11 Revision Date: 02/03/03

13

21

Date:

To:

From:

Subject

cc:

10

Issue Date: 3/13/02 Revision Date: 02/03/03

22

Issue Date: 3/13/02 Revision Date: 02/03/03

ì

;

23

Date:

To:

From:

Subject

cc:

Issue Date: 3/13/02 Revision Date: 02/03/03 24

Attachment Rate Authorization Letter November 14, 2002 Page 1 of 1

sue Date: 3/13/02 evision Date: 02/03/03 25

. . .

USA

JSA

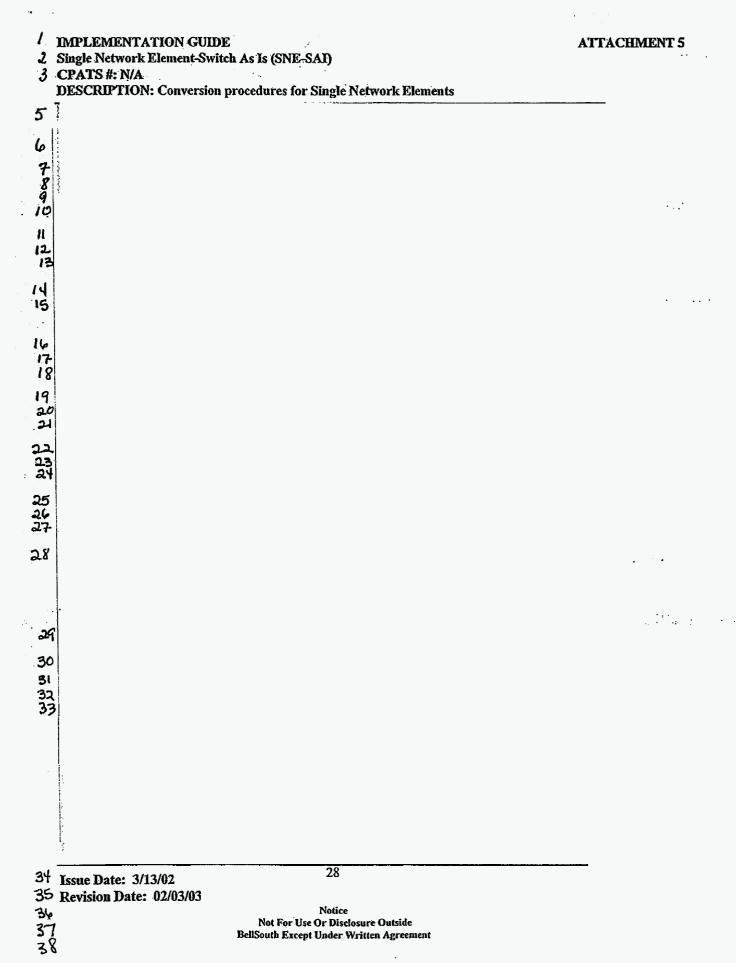
JSA

ssue Date: 3/13/02 levision Date: 02/03/03

SNESAI Implementation Guide

Issue Date: 3/13/02 Revision Date: 02/03/03

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement



BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1
DOCUMENT "JJ"

the supplied the second of the

PUBLIC DISCLOSURE DOCUMENT

CPG JOB AID

विवास सम्बद्ध सम्बद्ध

1

· . · .

...

.

20 21

22 23 24 į

CPG JOB AID

52

EXHIBIT 7 Circuit Design - Add

CIRCUIT DETAILS /FOR

СОМИРИВ

50 80

このことにはないといういろいろいろしてもののです なな

CLC 10B VID

CPG JOB AID

.

6

1 15

90

CPG JOB ATD

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint of XO Florida, Inc.)	
Against BellSouth Telecommunications,)	Docket No. 041114-TP
Inc. for Refusal to Convert Circuits to)	
UNEs and for Expedited Processing)	Filed: January 31, 2005
	1	

BELLSOUTH TELECOMMUNICATIONS, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files this Request for Specified Confidential Classification.

- On December 15, 2004, BellSouth served its proprietary responses to XO's First
 Set of Interrogatories (Nos. 1-8) and First Request for Production of Documents (Nos. 1-7).
- 2. In order for Staff to take possession of BellSouth's responses to XO, on December 16, 2004 BellSouth filed a Notice of Intent, in particular, for BellSouth's Response to Interrogatory No. 5 and the documents provided in BellSouth's Response to XO's First Request for Production, Item Nos. 1 and 7, which contains confidential business, proprietary information. 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. On January 6 and January 10, 2005, BellSouth filed its Request for Confidential Classification and Replacement Request to describe exactly what portions were proprietary.

BellSouth hereby files a Replacement Request for Confidential Classification to further, and more exactly, describe what is proprietary.

- 4. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.
- 5. Attachment C to BellSouth's Request for Confidential Classification is a proprietary highlighted copy of the confidential information.
- 6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.
- 7. 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 31st day of January 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

R. Douglas Lackey
James Meza III
BellSouth Center – Suite 4300
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0769

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 1 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-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 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. 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. 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.
- 3. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, BellSouth's internal procedures for Implementation of Single Network Element-Switch As-Is (SNE-SAI); Single Network Element SPA to UNE (SNESAI) Conversion Marketing Service Description These documents provide description, service restrictions, appropriate forms, service order issuance requirements, installation intervals, repair procedures, etc. Additionally, the information contains forecasted demand data and BellSouth's strategic schedule of deployment which competitors could use to gain an economic advantage.

Furthermore, this information has been prepared at great cost to BellSouth and therefore, others should not be permitted to gain the noncompetitive benefit from not having to develop these instructions and materials themselves. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 2 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Location	Reason
INTERROGATORY NO. 5	
Lines 4 and 5 of Response	1 and 2
<u>POD NO. 1</u>	
Document GG (Bates XO1STPODNO1000512)	
Columns B-L, Lines 3-35	1
Document II	
XO1stPODNO1000553, lines 6-28	3
XO1stPODNO1000554, lines 6-44	3
XO1stPODNO1000555, lines 6-30	3 3
XO1stPODNO1000556, lines 6-42 XO1stPODNO1000557, lines 6-27	3 3
XO1stPODNO1000558, lines 6-18	3
XO1stPODNO1000560, lines 2-26	3
XO1stPODNO1000561, lines 2-36	3
XO1stPODNO1000562, lines 2-14	3
XO1stPODNO1000563, lines 2-33	3
XO1stPODNO1000564, lines 2-13	3
XO1stPODNO1000565, lines 2-40	3
XO1stPODNO1000566, lines 2-34	3
XO1stPODNO1000567, lines 2-28	3
XO1stPODNO1000568, lines 2-31 XO1stPODNO1000569, lines 2-22	3 3
ACIST ODIVOIO0000, IIIIES 2-22	3

BellSouth Telecommunications, Inc. FPSC Docket No. 041114-TP Request for Confidential Classification Page 3 of 3 1/31/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE TO XO'S FIRST SET OF INTERROGATORIES, ITEM NO. 5 AND FIRST REQUEST FOR PRODUCTION, NOs. 1 AND 7, FILED DECEMBER 15, 2004, IN FLORIDA DOCKET NO. 041114-TP

Document II (cont)

XO1stPODNO1000570, lines 2-10	3
XO1stPODNO1000571, lines 2-29	3
XO1stPODNO1000572, lines 2-9	3
XO1stPODNO1000573, lines 2-27	3
XO1stPODNO1000574, lines 2-25	3
XO1stPODNO1000575, lines 2-15	3
XO1stPODNO1000576, lines 6-33	3
XO1stPODNO1000577, lines 2-25	3
XO1stPODNO1000578, lines 2-24	3
XO1stPODNO1000579, lines 5-33	3

DOCUMENT JJ

XO1stPODNO1000581, lines 2-41	3
XO1stPODNO1000582, lines 2-24	3
XO1stPODNO1000583, lines 2-8	3
XO1stPODNO1000584, lines 2-52	3
XO1stPODNO1000585, lines 2-51	3
XO1stPODNO1000586, lines 2-29	3
XO1stPODNO1000587, lines 2-69	3
XO1stPODNO1000588, lines 2-71	3
XO1stPODNO1000589, lines 2-26	3
110 1001 0	

POD NO. 7

Entire Document

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1 DOCUMENT "GG"

PUBLIC DISCLOSURE DOCUMENT

				•					· ·	. :		•
				 -		Special Acce	special Access (8PA) to UNE Project Management Conversion	Project Manag	ement Convers	roi	•	
	,		, 62	ري	· F	Ū	ш	D	I	H	P	$\boldsymbol{\lambda}$
			Company of the Company	Presentation	Obdy Dail. 1.	AND THE PROPERTY OF	Haraman and A	Otto	AND STATES OF THE STATES OF TH	end end	fiels and Access to U Could per le.	Test Oct
w -		Set up to per take per exportant (Perform predictoring manifest (Perform predictoring manifest) (Perform predictoring performance) (Perform performance)										
ריים		A PARTICIPATION OF THE PARTIES OF TH										
379	BOCABS pending at lease Orde	BOCADS - Very Access block for pending erbor & erit Leer Vib per over Taxes Orders in Call, (Supplicited)										
o• € €	2000	and order for their story										
2 =	Name of Party	defined by troing that have be										
न ए	Chors &	Legisla of codes that have being the property of codes of the code										
<u>;</u> ∓	1 1 1	Vate conducted of accessed and were correct grown in BOOMS										
. ¥	S Contra	Cert & FAC (NTEL)										
-	17	SOUR DESCRIPTION TO THE PROPERTY OF										
7	(S)	Managa puting all orders, validate basers with sace beetlas, CRO & CO Marega puting orders in validate bentiles Managa										
.10	Q T	Tine dealyn on the discernant of account work with Civilia's early in house with the LCSO.										
.,, 14	750 3	2.2 (ETET (Tenting) to CO. 2.3 (ETET (Tenting) to ACAC. Proposi Garage for Bow frough of each 2.4 deruit pressit WFA, 1987 E, 800AB to										
-1	25 see	Take Des Cherred										
'1	Signal of C	SWALE UNE COMPINE CHATE										
C)		spectari										
יי	क्ष	submitted that a ender dat. But be lasted or this research is required.										
•	29	Tent Fis per Channel										
	:											

SaniStudy access to una LXLS

12/7/2004

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1 DOCUMENT "II"

PUBLIC DISCLOSURE DOCUMENT

```
/ IMPLEMENTATION GUIDE
   2 Single Network Element-Switch As Is (SNE-SAI)
 3 CPATS #: N/A
4 DESCRIPTION: Conversion procedures for Single Network Elements
  5 Keywords: SNE-SAI, Single Network Elements, Conversions
  8
  9
  10
     ļl
     12
     13
     14
     15
    -16
     17
      18
     19
     20
      21
      22
      23
. 24
 25
 26
27
 28
 29
```

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

Issue Date: 3/13/02

Revision Date: 02/03/03

```
1 IMPLEMENTATION GUIDE
      2 Single Network Element-Switch As Is (SNE-SAI)
         3 CPATS#: N/A
 4 DESCRIPTION: Conversion procedures for Single Network Elements
                  Keywords: SNE-SAI, Single Network Elements, Conversions
नित्र मिति । १००० मान स्टेंग्य स्टेंग्य के अस्त्र के अस्त्र स्टेंग्य के अस्त्र स्टेंग्य के अस्त्र स्टेंग्य के अस्त्र स्टेंग्य स्टेंग्य के अस्त्र स्टेंग्य स्टेंग्य के अस्त्र स्टेंग्य स्टेंग्य स्टेंग्य के अस्त्र स्टेंग्य 
   对 5% 年 七 十 年 年 中
```

45 Issue Date: 3/13/02 4. Revision Date: 02/03/03 3

```
IMPLEMENTATION GUIDE
2 Single Network Element-Switch As Is (SNE-SAI)
   CPATS #: N/A
   DESCRIPTION: Conversion procedures for Single Network Elements
   Keywords: SNE-SAI, Single Network Elements, Conversions
47
8
9
10
 Il
12
13
14
. 15
16
 17
 18
 19
 20
 21
 عد
23
25
24
27
28
29
30
```

31 Issue Date: 3/13/0232 Revision Date: 02/03/03

 Notice

atr bદ 38 Je Fe 92 46 ξĒ **78**... 90 500 55 53 1<u>C</u> ot b1 81 5 Keywords: SNE-SAI, Single Network Elements, Conversions 4 DESCRIPTION: Conversion procedures for Single Network Elements OFATS #: WA Single Network Element-Switch As Is (SNE-SAI) IMPLEMENTATION CUIDE

43 Issue Date: 3713/02
43 Revision Date: 02/03/03
44 Not For Use Or Disclosure Outside
45 Bellsouth Except Under Written Agreement

```
/ IMPLEMENTATION GUIDE
2 Single Network Element-Switch As Is (SNE-SAI)
3 CPATS #: N/A
# DESCRIPTION: Conversion procedures for Single Network Elements
5 Keywords: SNE-SAI, Single Network Elements, Conversions
 10
 11
 12.
 13
 14.
  15
  16
  18
  19
  20
```

```
28 Issue Date: 3/13/02
29 Revision Date: 02/03/03
30
31
```

عاد

27

32

6

IMPLEMENTATION GUIDE

2 Single Network Element-Switch As Is (SNE-SAI)

3 CPATS #: N/A

4 DESCRIPTION: Conversion procedures for Single Network Elements

Keywords; SNE-SAI, Single Network Elements, Conversions

19 Issue Date: 3/13/02 36 Revision Date: 02/03/03

So Revision Date: 02/03/03

93 33 Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

. 1

Single Network Element SPA to UNE (SNESAI) Conversion Marketing Service Description Version 10 November 13, 2002

Document Prepared by:

Michael Hurst, Product Manager 205-977-1223

7

Issue Date: 3/13/02 Revision Date: 07/01/02

8

Issue Date: 3/13/02 Revision Date: 07/01/02

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

37 Issue Date: 3/13/02 38 Revision Date: 07/01/02

10

ATTACHMENT 1 Issue Date: 3/13/02 Revision Date: 07/01/02 15 11 16 Notice Not For Use Or Disclosure Outside 17 18 19 BellSouth Except Under Written Agreement

XO1stPODNO1000562

,		

```
17
  18
  19
   28
   2.9
 30
31 T
```

34 Issue Date: 3/13/02 35 Revision Date: 07/01/02

1

36

31 38 12

ıŧ 12

13

Issue Date: 3/13/02 Revision Date: 07/01/02

13

41 Issue Date: 3/13/02 42 Revision Date: 07/01/02

14

43 44 45

34 Issue Date: 3/13/02 35 Revision Date: 07/01/02

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

24 27 29

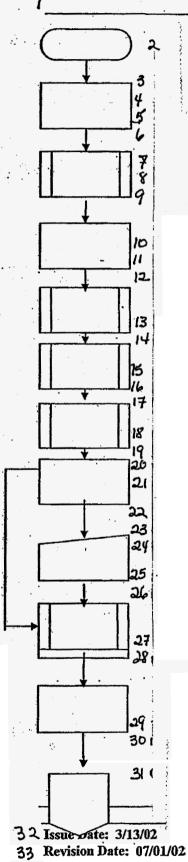
29 Issue Date: 3/13/02 30 Revision Date: 07/01/02

3! 32 33

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

•





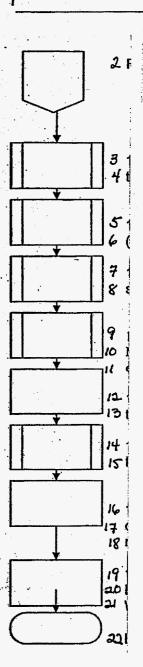
. . .

34 35 36

Notice

Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

1.1



23 Issue Date: 3/13/02 → Revision Date: 07/01/02

18

. . .

11 Issue Date: 3/13/02

€ 5€

Notice Not For Use Or Disciosure Outside BellSouth Except Under Written Agreement

duthor a o

30 Issue Date: 3/13/02 31 Revision Date: 02/03/03

ચ

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

. . .

10 Issue Date: 3/13/02 11 Revision Date: 02/03/03

1314

Notice Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

Date:

To:

From:

Subjec

cc:

11 10

112 图图588 1101134

Gi

Issue Date: 3/13/02

Revision Date: 02/03/03

7 7

22

Issue Date: 3/13/02 Revision Date: 02/03/03 23

Date:

To:

From:

Subject

cc:

Issue Date: 3/13/02 Revision Date: 02/03/03

Attachment Rate Authorization Letter November 14, 2002 Page 1 of 1

sue Date: 3/13/02 evision Date: 02/03/03 25

. . . .

. . . . D usd USA JSA

ssue Date: 3/13/02 kevision Date: 02/03/03

Notice

Not For Use Or Disclosure Outside BellSouth Except Under Written Agreement

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
XO's 1st Request for Production
November 22, 2004
Item No. 1

POD NO. 1 DOCUMENT "JJ"

PUBLIC DISCLOSURE DOCUMENT

CPG JOB AID

CPG JOB ATD

12345690

175

, ~

CPG JOB AID

è

Δ

25 456440111211515111892173456

28

COMMAND CIRCUIT DETAILS /FOR

CPG JOB AID

. . . •