

ANDREW D. SHORE
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(404) 335-0765

April 20, 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 Request for Confidential Classification for the Late-filed Deposition Exhibit to the Staff conducted deposition of BellSouth witnesses Shelley W. Padgett and Michael E. Willis, 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,



Andrew D. Shore

Enclosures

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

DOCUMENT NUMBER-DATE

03892 APR 20 05

FPSC-COMMISSION CLERK


**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 First Class U.S. Mail this 20th day of April, 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
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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


Andrew D. Shore

(+) SIGNED PROTECTIVE AGREEMENT

**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: April 20, 2005

**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 March 31, 2005, BellSouth Telecommunications, Inc. filed the late-filed Deposition Exhibit of Shelley W. Padgett and Michael Willis. This exhibit contained information that is proprietary to both BellSouth and to XO.
2. In order for Staff to take possession of the Late-filed Deposition Exhibit BellSouth is filing this Request for Specified Confidential Classification. The Late-Filed Deposition Exhibit 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. BellSouth is filing this Request for Confidential Classification to describe exactly what portions are 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 20th day of April, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, followed by the initials "RN" in a stylized font.

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

Handwritten signature of R. Douglas Lackey in cursive, followed by the initials "RN" in a stylized font.

R. Douglas Lackey
Andrew D. Shore
BellSouth Center – Suite 4300
675 West Peachtree Street, N.E.
Atlanta, Georgia 30375
(404) 335-0765

ATTACHMENT A

BellSouth Telecommunications, Inc.
FPSC Docket No. 041114-TP
Request for Confidential Classification
Page 1 of 1
4/20/05

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
CONFIDENTIAL LATE-FILED DEPOSITION EXHIBIT OF SHELLEY W. PADGETT
AND MICHAEL E. WILLIS, AS FILED MARCH 31, 2005,
IN FLORIDA DOCKET NO. 041114-TP**

Explanation of Proprietary Information

1. This information contains competitive, business information as well as customer proprietary information. This information is valuable, it is used by BellSouth and XO in conducting their business and both companies 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.

Location

Reason

Late-Filed Deposition Exhibit

Pages 1-30

1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 041114-TP
Request for Confidential Classification
Page 1 of 1
4/20/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S
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AND MICHAEL E. WILLIS, AS FILED MARCH 31, 2005,
IN FLORIDA DOCKET NO. 041114-TP**

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Late-Filed Deposition Exhibit
Shelley W. Padgett and Michael Willis



PUBLIC DISCLOSURE DOCUMENT

(Pages 1-30 Redacted in their entirety)

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 041114-TP
Late-Filed Deposition Exhibit
Shelley W. Padgett and Michael Willis

PUBLIC DISCLOSURE DOCUMENT

(Pages 1-30 Redacted in their entirety)

ATTACHMENT C

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FPSC Docket No. 041114-TP
Request for Confidential Classification
Page 1 of 1
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PROPRIETARY COPY