

Nancy B. White  
General Counsel – Florida

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
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(305) 347-5558

August 5, 2005

Mrs. Blanco S. Bayo  
Director, Division of the Commission Clerk  
And Administrative Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: **Undocketed Matter**  
**Year 2005 Local Competition Report Data Request - ILEC**

Dear Mrs. Bayo

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc's Request for Specified Confidential Classification for **BellSouth's Responses to the Commission's Request, Item No. 3 and Tables 1-4** which contain confidential information, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me.

Sincerely,

  
Nancy B. White

Enclosure

Cc: All Parties of Record  
Beth Salak  
Lisa Harvey

DOCUMENT NUMBER - DATE

07618 AUG -5 '05

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2004 Incumbent Local Exchange)  
Carrier (ILEC) Data Request )  
\_\_\_\_\_ )

Undocketed

Filed: August 5, 2005

**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 its Request for Specified Confidential Classification.

1. On July 15, 2005, BellSouth filed its Responses to the Florida Public Service Commission's ("Commission") 2005 ILEC Data Request related to the status of local competition in Florida. BellSouth's Responses to the Commission's Request, Item No. 3 and Tables 1-4 produced on proprietary CD-ROMs and on paper, contain information that is proprietary to BellSouth. In addition, on July 15, 2005 BellSouth filed a Notice of Intent to Request Specified Confidential Classification.

2. On August 1, 2005, BellSouth filed its First Supplemental Response to the 2005 ILEC Data Request, Tables 2 and 3 which contains information that is proprietary to BellSouth. Furthermore, BellSouth filed a Notice of Intent on August 1, 2005 with respect to BellSouth's Supplemental Responses to Tables 2 and 3.

3. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained on the CD-ROMs and/or the paper copies in BellSouth's Responses to the Commission's Request, Item No. 3 and Tables 1-4, and First Supplemental Response to Tables 2 and 3 include proprietary data relating to confidential

information of competing local exchange carriers that is protected under the FCC's Customer Proprietary Network Information Rules and confidential business information utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of such information would disadvantage BellSouth's customers and potentially harm their ability to compete in the telecommunications market. Additionally, the disclosure of this information would cause competitive harm to BellSouth and provide competitors with an unfair advantage. Therefore, such information should be classified as confidential, customer proprietary information pursuant to Section 364.24 and Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

4. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

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

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

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 5<sup>th</sup> day of August, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

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JAMES MEZA III  
c/o Nancy Sims  
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(305) 347-5558

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R. DOUGLAS LACKEY  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0747

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
Undocketed  
Request for Confidential Classification  
Page 1 of 5  
08/05/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S RESPONSE TO THE COMMISSION'S REQUEST,  
ITEM NO. 3 AND TABLES 1-4, FILED ON FILED ON JULY 15, 2005**

**Explanation of Proprietary Information**

1. This information contains third-party business information related to the competitive interests of third-party companies that is proprietary. Specifically, the subject information is confidential, customer-specific proprietary information that is also protected under the FCC's Customer Proprietary Network information rules, 47 CFR §64.2007. Disclosure of this data would impair the competitive business and cause harm to the third-party companies. Consequently, this information 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. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Specifically, this information relates to percentages and line counts of residential and business customers and information consisting of the number of working lines detailed by wire center. Consequently, this information 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.

ATTACHMENT A

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S RESPONSE TO THE COMMISSION'S REQUEST,  
ITEM NO. 3 AND TABLES 1-4, FILED ON FILED ON JULY 15, 2005

REQUEST, TABLE 1 (excel spreadsheet)

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
Total VGE Lines	2

REQUEST, TABLE 2 (excel spreadsheet)

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
CLEC Name	1
Total VGE Lines	1

REQUEST, TABLE 3 (excel spreadsheet)

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
CLEC Name	1
Total Lines	1

ATTACHMENT A

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S RESPONSE TO THE COMMISSION'S REQUEST,  
ITEM NO. 3 AND TABLES 1-4, FILED ON FILED ON JULY 15, 2005

**REQUEST, TABLE 4 (excel spreadsheet)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
Total Lines	2

**REQUEST, ITEM NO. 3 (a) (word document)**

<u>Location</u>	<u>Reason</u>
<u>RESPONSE :</u>	
Percentage contained in the Response.	2

**REQUEST, ITEM NO. 3 (b)(c) (word document)**

<u>Location</u>	<u>Reason</u>
Numerics contained in the Responses.	2

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
Undocketed  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S RESPONSE TO THE COMMISSION'S REQUEST,  
ITEM NO. 3 AND TABLES 1-4, FILED ON FILED ON JULY 15, 2005**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**



**ATTACHMENT C**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
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**08/05/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S RESPONSE TO THE COMMISSION'S REQUEST,  
ITEM NO. 3 AND TABLES 1-4, FILED ON FILED ON JULY 15, 2005**

**ONE HIGHLIGHTED COPY**