Meredith Mays Senior Regulatory Counsel

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (404) 335-0750

September 9, 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: Docket No. 041269-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification regarding its proprietary responses to Covad's First Set of Interrogatories (Nos. 2-3), 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,

Muldith May IRN
Meredith Mays

cc: All Parties of Record Jerry Hendrix R. Douglas Lackey Nancy B. White

CERTIFICATE OF SERVICE Docket No. 041269-TP

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

Electronic Mail, First Class U.S. Mail and FedEx* this 9th day of September, 2005 to the following

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Meredith Mays

(+) signed Protective Agreement (*) via FedEX

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:)	
)	Docket No. 041269-TP
Petition to Establish Generic Docket to)	
Consider Amendments to Interconnection)	
Agreements Resulting From Changes of Law)	Filed: September 9, 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.

- On September 8, 2005, BellSouth served its proprietary responses to Covad's First Set of Interrogatories (Nos. 2-3).
- 2. In order for Staff to take possession of BellSouth's responses to Covad, BellSouth is filing this Request for Confidential Classification. 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 proprietary highlighted copy of the confidential information.

- 5. 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.
- 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 9th day of September, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

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ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket No. 041269-TP Request for Confidential Classification Page 1 of 1 9/9/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO COVAD'S FIRST SET OF INTERROGATORIES, ITEM NOS. 2 AND 3, SERVED SEPTEMBER 9, 2005, IN FLORIDA DOCKET NO. 041269-TP

Explanation of Proprietary Information

1. The information provided in response to this discovery request consists of confidential information of competing local exchange carriers that is protected under the FCC's Customer Proprietary Network Information Rules, 47 C.F.R. § 64.2007. The disclosure of such information would disadvantage Bellsouth and BellSouth's customers and potentially harm the ability to compete in the telecommunications market.

Location	Reason
Interrogatory No. 2	
Lines 1-23, entire line	.1
Interrogatory No. 3	
Pages 1-11, Columns B-E, all lines	1
Pages 12-14, Columns B-F, all lines	1
Pages 15-23, Columns B-E, all lines	1

ATTACHMENT B

BellSouth Telecommunications, Inc. FPSC Docket No. 041269-TP Request for Confidential Classification Page 1 of 1 9/9/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO COVAD'S FIRST SET OF INTERROGATORIES, ITEM NOS. 2 AND 3, SERVED SEPTEMBER 9, 2005, IN FLORIDA DOCKET NO. 041269-TP

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

ATTACHMENT C

BellSouth Telecommunications, Inc. FPSC Docket No. 041269-TP Request for Confidential Classification Page 1 of 1 9/9/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSES TO COVAD'S FIRST SET OF INTERROGATORIES, ITEM NOS. 2 AND 3, SERVED SEPTEMBER 9, 2005, IN FLORIDA DOCKET NO. 041269-TP

PROPRIETARY COPY