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October 13, 2005

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 000121A-TP**  
**In Re: Investigation into the establishment of operations support  
systems permanent incumbent local exchange Telecommunications  
companies**

Dear Ms. Bayó:

In response to Staff's September 30<sup>th</sup> request, please find enclosed for filing an original and fifteen copies of the Second Supplemental Affidavit of Alphonso J. Varner and accompanying documents. Because certain portions of the accompanying documents contain proprietary information, BellSouth is filing its Request for Specified Confidential Classification, 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,

  
Robert A. Culpepper

Enclosures

cc: All parties of record  
Jerry D. Hendrix  
Nancy B. White  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

09874 OCT 13 05

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

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

Electronic Mail and U.S. Mail this 13th day of October, 2005 to the following:

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Robert A. Culpepper

**(+) Signed Protective  
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the ) Docket No. 000121A-TP  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local Exchange )  
Telecommunications Companies ) Filed: October 13, 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 October 13, 2005, BellSouth Telecommunications, Inc. filed its Second Supplemental Affidavit of Alphonso J. Varner in response to the request of the Commission Staff dated September 30, 2005. BellSouth's Response to Item No. 57(2) and attachments to Response Nos. 47(a), 47(b), 48 and 49(1) contain confidential business information.

2. In order for Staff to take possession of BellSouth's responses, BellSouth is filing this Request for Specified Confidential Classification. BellSouth's Response to 57(2) as well as the attachments to Item Nos. 47(a), 47(b), 48 and 49(1) 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 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.

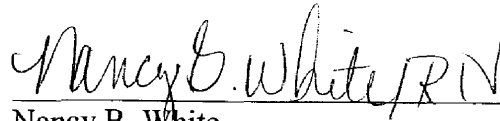
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.

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 13<sup>th</sup> day of October, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

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


Nancy B. White

c/o Nancy Sims

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Handwritten signature of Robert Culpepper in cursive, followed by the initials "RN" in a larger, bold font.

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BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SECOND  
 SUPPLEMENTAL AFFIDAVIT OF ALPHONSO J. VARNER AS FILED  
 SEPTEMBER 30, 2005, IN FLORIDA DOCKET NO. 000121A-TP**

**Explanation of Proprietary Information**

1. This information contains customer-specific proprietary information. Consequently, this information should be classified as proprietary, customer-specific confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
2. 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, this document contains information related to the findings of The Liberty Consulting Group in their review of BellSouth's performance measurement plan. The network operations/systems that are necessary to implement this plan and the functions each perform, as well as specific coding of order is considered proprietary and confidential to BellSouth as it describes BellSouth's internal operations. Furthermore, this information has been prepared at great cost to BellSouth. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

<u>Location</u>	<u>Reason</u>
<u>57(2)</u> 1 <sup>st</sup> Column Entitled CLEC, lines 1-2	1
<u>Attachment to 47(a)</u> Entire document	2
<u>Attachment to 47(b)</u> Entire document	2
<u>Attachment to 48</u> Entire document	2
<u>Attachment to 49.1</u> Entire document	2



**ATTACHMENT B**

**BellSouth Telecommunications, Inc.**  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SECOND  
SUPPLEMENTAL AFFIDAVIT OF ALPHONSO J. VARNER AS FILED  
SEPTEMBER 30, 2005, IN FLORIDA DOCKET NO. 000121A-TP**

**2 COPIES OF PUBLIC DISCLOSURE DOCUMENT**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S SECOND  
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SEPTEMBER 30, 2005, IN FLORIDA DOCKET NO. 000121A-TP**

**PROPRIETARY COPY**