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October 18, 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 a filing by CompSouth that includes BellSouth's proprietary information 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,


Meredith Mays

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

606410

DOCUMENT NUMBER-DATE

10104 OCT 18 05

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 041269-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and U.S. Mail this 18th day of October, 2005 to the following:

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Meredith E. 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: October 18, 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 it's Request for Specified Confidential Classification.

1. On September 27, 2005, CompSouth filed BellSouth's Confidential Response to Item No. 1 of ITC^DeltaCom's 1st Set of Data Requests and BellSouth's Confidential Response to Item No. 1 of CompSouth's First Set of Data Requests in Georgia Docket No. 19341-U. These responses contain information that is considered to be proprietary to BellSouth. In addition, on September 27, 2005, CompSouth filed a Notice of Intent to Request Specified Confidential Classification.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Responses to Item No. 1 to DeltaCom's (DeltaCom) 1st Set of Data Requests and Item No. 1 to CompSouth's 1st Set of Data Requests in Georgia Docket No. 19341-U include information that BellSouth considers to be confidential business information. A more specific description of this information is contained in Attachment A. Public disclosure of this information may cause harm to BellSouth. Therefore, such information should be classified as confidential business 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.

3. 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.

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

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

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 18th day of October, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, written over a horizontal line.

NANCY B. WHITE

c/o Nancy H. Sims

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Tallahassee, FL 32301

(305) 347-5558

Handwritten signature of R. Douglas Lackey in cursive, written over a horizontal line.

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COUNSEL FOR BELLSOUTH
TELECOMMUNICATIONS, INC.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 041269-TP
Request for Confidential Classification
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9/27/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELL SOUTH'S RESPONSE
TO ITC^DELTACOM'S FIRST DATA REQUESTS, ITEM NO. 1, IN GEORGIA
DOCKET NO. 19341-U, WHICH COMPSOUTH FILED SEPTEMBER 27, 2005
IN FLORIDA DOCKET NO. 041239-TP**

Explanation of Proprietary Information

1. This information contains proprietary, trade secret information consisting of an agreement between BellSouth's Legal Department and Deloitte & Touche LLP and billing for professional services. The disclosure of such information would benefit BellSouth's competitors and potentially harm BellSouth's ability to compete in the telecommunications market.
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 line counts for services consisting of the number of working lines detailed by wire center. The confidential information sought to be protected is not generally known, and this information is not readily ascertainable to third parties by any proper means. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(d), Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO ITEM NO. 1 OF ITC^DELTACOM'S FIRST DATA REQUESTS AND ITEM NO. 1
OF COMPSOUTH'S FIRST DATA REQUESTS, IN GEORGIA DOCKET NO. 19341-U,
WHICH COMPSOUTH FILED SEPTEMBER 27, 2005
IN FLORIDA DOCKET NO. 041239-TP

<u>Pages</u>	<u>Location</u>	<u>Reason</u>
<u>BellSouth's Response to DeltaCom</u>		
2-9	Entire Page	1
<u>BellSouth's Response to CompSouth</u>		
1	All Information in columns labeled A-J	2

ATTACHMENT B

**BellSouth Telecommunications, Inc.
FPSC Docket No. 041269-TP
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO ITEM NO. 1 OF ITC^DELTACOM'S FIRST DATA REQUESTS AND ITEM NO. 1
OF COMPSOUTH'S FIRST DATA REQUESTS, IN GEORGIA DOCKET NO. 19341-U,
WHICH COMPSOUTH FILED SEPTEMBER 27, 2005
IN FLORIDA DOCKET NO. 041239-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**BellSouth Telecommunications, Inc.
FPSC Docket No. 041269-TP
Request for Confidential Classification
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09/27/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO ITEM NO. 1 OF ITC^DELTACOM'S FIRST DATA REQUESTS AND ITEM NO. 1
OF COMPSOUTH'S FIRST DATA REQUESTS, IN GEORGIA DOCKET NO. 19341-U,
WHICH COMPSOUTH FILED SEPTEMBER 27, 2005
IN FLORIDA DOCKET NO. 041239-TP**

ONE HIGHLIGHTED COPY