

Meredith Mays
Senior Regulatory Counsel

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

October 31, 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 Response to Staff's Third Set of Interrogatories Item No. 84 and Staff's Third Request for Production of Documents, No. 7, 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

607360

DOCUMENT NUMBER-DATE

10532 OCT 31 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 31st day of October, 2005 to the following:

Adam Teitzman
Michael Barrett
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6199
ateitzma@psc.state.fl.us
mbarrett@psc.state.fl.us

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax No. (850) 681-9676
mgross@fcta.com

Vicki Gordon Kaufman (+)(
Moyle Flanigan Katz Raymond
& Sheehan, PA
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No. (850) 681-3828
Fax. No. (850) 681-8788
vkaufman@moylelaw.com
Atty. for FCCA/CompSouth

Norman H. Horton, Jr.
Meser, Caparelo & Self, P.A.
215 South Monroe Street, Suite 701
P.O. Box 1876
Tallahassee, FL 32302-1876
Tel. No. (850) 222-0720
Fax No. (850) 224-4359
nhorton@lawfla.com
Represents NuVox/NewSouth/Xspedius

John Heitmann
Garret R. Hargrave
Kelley Drye & Warren, LLP
Suite 500
1200 19th Street, N.W.
Washington, D.C. 20036
jheitmann@kelleydrye.com
ghargrave@kelleydrye.com
Tel. No. (202) 887-1254
Represents NuVox/NewSouth/Xspedius

Kenneth A. Hoffman, Esq.
Martin P. McDonnell, Esq.
Rutledge, Ecenis, Purnell & Hoffman
P.O. Box 551
Tallahassee, FL 32302
Tel. No. (850) 681-6788
Fax. No. (850) 681-6515
Represents XO and US LEC
ken@reuphlaw.com
marty@reuphlaw.com

Dana Shaffer
XO Communications, Inc.
105 Molloy Street, Suite 300
Nashville, Tennessee 37201
Tel. No. (615) 777-7700
Fax. No. (615) 850-0343
dana.shaffer@xo.com

Wanda Montano
Terry Romine (+)()
US LEC Corp.
6801 Morrison Blvd.
Charlotte, N.C. 28211
Tel. No. (770) 319-1119
Fax. No. (770) 602-1119
wmontano@uslec.com

Tracy W. Hatch
Senior Attorney
AT&T
101 North Monroe Street
Suite 700
Tallahassee, FL 32301
Tel. No. (850) 425-6360
thatch@att.com

Sonia Daniels
Docket Manager
1230 Peachtree Street, N.E.
4th Floor
Atlanta, Georgia 30309
Tel. No. (404) 810-8488
sdaniels@att.com

Donna Canzano McNulty, Esq.
MCI
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301
Telephone: 850 219-1008
donna.mcnulty@mci.com

De O'Roark, Esq. (+)()
MCI
6 Concourse Parkway
Suite 600
Atlanta, GA 30328
de.oroark@mci.com

Floyd Self, Esq.
Messer, Caparello & Self, P.A.
Hand: 215 South Monroe Street
Suite 701
Tallahassee, FL 32301
Mail: P.O. Box 1876
Tallahassee, FL 32302-1876
fself@lawfla.com

Steven B. Chaiken
Supra Telecommunications and
Info. Systems, Inc.
General Counsel
2901 S.W. 149th Avenue
Suite 300
Miramar, FL 33027
Tel. No. (786) 455-4239
steve.chaiken@stis.com

Matthew Feil (+)()
FDN Communications
2301 Lucien Way
Suite 200
Maitland, FL 32751
Tel. No. (407) 835-0460
mfeil@mail.fdn.com

Nanette Edwards (+)()
ITC^DeltaCom Communications, Inc.
7037 Old Madison Pike
Suite 400
Huntsville, Alabama 35806
Tel. No.: (256) 382-3856
nedwards@itcdeltacom.com

Susan Masterton
Sprint Communications Company
Limited Partnership
P.O. Box 2214
Tallahassee, FL 32316-2214
Tel. No.: (850) 599-1560
Fax No.: (850) 878-0777
susan.masterton@mail.sprint.com

Alan C. Gold, Esq.
Gables One Tower
1320 South Dixie Highway
Suite 870
Coral Gables, FL 33146
Tel. No. (305) 667-0475
Fax. No. (305) 663-0799
agold@kcl.net

Raymond O. Manasco, Jr.
Gainesville Regional Utilities
Hand: 301 S.E. 4th Avenue
Gainesville, FL 32601
Mail: P.O. Box 147117, Station A-138
Gainesville, FL 32614-7117
Tel. No. (352) 393-1010
Fax No. (352) 334-2277
manascoro@gru.com

Charles A. Guyton
Squire, Sanders & Dempsey LLP
215 South Monroe Street
Suite 601
Tallahassee, FL 32301-1804
Tel. No. (850) 222-2300
Fax. No. (850) 222-8410
cguyton@steelhector.com
Atty. for City of Gainesville

Herb Bornack, CEO
Orlando Telephone Systems, Inc.
4558 S.W. 35th Street
Suite 100
Orlando, FL 32811
Tel. No. (407) 996-8900
Fax. No. (407) 996-8901

Adam Kupetsky
Regulatory Counsel
WilTel Communications, LLC
One Technology Center (TC-15)
100 South Cincinnati
Tulsa, Oklahoma 74103
Tel. No. (918) 547-2764
Fax. No. (918) 547-9446
adam.kupetsky@wiltel.com

Jonathan S. Marashlian, Esq.
The Helein Law Group, LLLP
8180 Greensboro Drive, Suite 700
McLean, VA 22102
Tel. No. (703) 714-1313
Fax. No. (703) 714-1330
jsm@thlglaw.com
Atty. for Azul Tel.

Charles (Gene) E. Watkins (+)(
Senior Counsel
Government & External Affairs
Covad Communications Company
1230 Peachtree Street NE
Suite 1900
Atlanta, GA 30309
Tel. No. (678) 528.6816
Fax No. (678) 528.6806
Cell No. (404) 915.0018
gwatkins@covad.com


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 31, 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 October 26, 2005, BellSouth filed its Response to the Staff of the Public Service Commission's (hereinafter "Staff") Third Set of Interrogatories (Nos. 72-163) and Third Request for Production of Documents (Nos. 4-15), portions of which contain information that the CLECs may consider to be proprietary, as well as BellSouth confidential information. On October 26, 2005 BellSouth filed also 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 Response to Staff's Third Set of Interrogatories, Item No. 84 includes information that the CLECs may consider to be confidential business information. BellSouth's Response to Staff's Third Request for Production, Item No. 7 contains confidential business information of BellSouth. A more specific description of this information is contained in Attachment A. Public disclosure of this information may cause harm to BellSouth and the CLECs. Therefore, absent further information

by the CLECs, 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, unless articulated otherwise by the CLECs because it is their information, 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 31st day of October, 2005.

Nancy B. White *RN*

NANCY B. WHITE

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

R. Douglas Lackey *RN*

R. DOUGLAS LACKEY

ANDREW D. SHORE

MEREDITH MAYS

675 W. Peachtree Street, Suite 4300

Atlanta, GA 303075

(404) 335-0750

ATTACHMENT A

**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 STAFF'S THIRD SET OF INTERROGATORIES, ITEM NO. 84 AND THIRD
REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO 7, FILED OCTOBER 26,
2005 IN FLORIDA DOCKET NO. 041269-TP**

Explanation of Proprietary Information

1. This information arguably contains confidential business information related to competitive interests of the CLECs. The CLECs may argue that the disclosure of this data would impair the competitive business and cause harm to the CLECs.
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 specific retail and wholesale services. 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

**BellSouth Telecommunications, Inc.
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Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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2005 IN FLORIDA DOCKET NO. 041269-TP**

Interrogatory No. 84

<u>Page/Item No.</u>	<u>Location</u>	<u>Reason</u>
Response to 84 (b)	Entire Response	1
Response to 84 (c)	Marked BEGIN and END CONFIDENTIAL	1

Production of Documents, Item No. 7

<u>Columns:</u>	<u>Page Numbers</u>	<u>Reason</u>
Retail-Resale Bus Line Count MegaLink and Light Gate NARS VUMXX (DS0 equivalent) Retail-Resale Business DS0 DS0 UNE-L DS1 UNE-L Business UNE-P DS0 EEL DS1 EEL DS3 EEL Wholesale Business UNE and EEL	1-32	2

ATTACHMENT B

**BellSouth Telecommunications, Inc.
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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2005 IN FLORIDA DOCKET NO. 041269-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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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
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2005 IN FLORIDA DOCKET NO. 041269-TP**

ONE HIGHLIGHTED COPY