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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 Third Supplemental Response to Covad's First Request for Production of Documents (No. 1), 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

697989

DOCUMENT NUMBER-DAT  
10538 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 31<sup>st</sup> 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 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 20, 2005, BellSouth filed its Third Supplemental Response to DIECA Communications, Inc. d/b/a Covad Communications Company's (hereinafter "Covad") First Request for Production of Documents, Item No. 1, which contains information that the CLECs may consider to be proprietary. In addition, on October 20, 2005 BellSouth 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 Third Supplemental Response to Covad's First Request for Production of Documents includes information that the CLECs may consider 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 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 31<sup>st</sup> day of October, 2005.

*Nancy B. White PH*

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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041269-TP  
Request for Confidential Classification  
Page 1 of 2  
10/31/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S THIRD  
SUPPLEMENTAL RESPONSE TO COVAD'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS, ITEM NO 1, FILED OCTOBER 20, 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.

**Production of Documents, Item No. 1**

<u>Location</u>	<u>Bate Stamped Page Numbers</u>	<u>Reason</u>
Reference to and/or CLEC Response	243, Paragraph 1 247, Lines 1,2,3 248, Lines 1,2 251, Lines 1-6 293, Lines 1,2 293, Paragraph 3 293, Lines 4,5 294, Lines 1,2,3 297, Lines 2,3,4, Paragraph 5	1
BellSouth wire center CLLI code(s) that identify possible CLEC collocation	271 282, 283,285,287,288 290 301	1



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041269-TP  
Request for Confidential Classification  
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**Production of Documents, Item No. 1**

<u>Location</u>	<u>Date Stamped Page Numbers</u>	<u>Reason</u>
CLEC's Response to BellSouth's Request For Admission/Interrogatories	240,241 244, Paragraph 1 245,246 Lines 1-2 249 and 250 259 and 260 266,267,268 273, 274 288 290 291,292 298	1
Covad Attachment	242 - Entire Page	1
NTC Attachment	264-Entire Page	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.**  
**FPSC Docket No. 041269-TP**  
**Request for Confidential Classification**  
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**10/31/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S THIRD  
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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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10/31/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S THIRD  
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**ONE HIGHLIGHTED COPY**