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March 10, 2006

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: <u>Docket No. 050119-TP</u>: Joint Petition of TDS Telecom d/b/a TDS Telecom/Quincy Telephone, ALLTEL Florida, Inc., Northeast Florida Telephone Company d/b/a NEFCOM, GTC, Inc. d/b/a GT Com, Smart City Telecommunications, LLC d/b/a Smart City Telecom, ITS Telecommunications Systems, Inc. and Frontier Communications of the South, LLC ("Joint Petitioner") objecting to and requesting suspension of Proposed Transit Traffic Service Tariff filed by BellSouth Telecommunications, Inc.

<u>Docket No. 050125-TP</u>: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL 2004-284 filed by BellSouth Telecommunications, Inc. by AT&T Communications of the Southern States, LLC

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s *Replacement* Request for Specified Confidential Classification, which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel N. Gurdian Manuel A. Gurdian

Enclosures

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

DOCUMENT NUMBER-BATE

02108 MAR 10 8

CERTIFICATE OF SERVICE Docket Nos.: 050119-TL and 050125-TP; Consolidated Pursuant to Order No.: PSC-05-0517-PAA-TP

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

Electronic Mail and U.S. Mail this 10th day of March, 2006 to the following:

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Manuel A. Gurdian

(+) Signed Protective Agreement

FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of TDS Telecom d/b/a TDS)
Telecom/Quincy Telephone, ALLTEL Florida,)
Inc., Northeast Florida Telephone Company d/b/a) Docket No. 050119-TP
NEFCOM, GTC, Inc. d/b/a GT Com, Smart City)
Telecommunications, LLC d/b/a Smart City)
Telecom, ITS Telecommunications Systems, Inc.)
and Frontier Communications of the South, LLC,)
concerning BellSouth Telecommunications, Inc.'s)
Transit Service Tariff)
)
In re: Petition and Complaint of AT&T)
Communication of the Southern States, LLC) Docket No. 050125-TP
For suspension and cancellation of Transit Traffic)
Service Tariff No. FL2004-284 filed by)
BellSouth Telecommunications, Inc.) Filed: March 10, 2006
)

BELLSOUTH TELECOMMUNICATIONS, INC.'S REPLACEMENT 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 Replacement Request for Specified Confidential Classification and states the following.

- 1. On March 6, 2006, BellSouth filed its First Supplemental Response to MetroPCS California/Florida, Inc.'s, (hereinafter "MetroPCS") First Request for Production of Documents. BellSouth's Supplemental Response to MetroPCS' First Request for Production of Documents, Item No. 3, contains information that is proprietary to BellSouth. BellSouth filed a Request for Specified Confidential Classification on March 6, 2006.
- 2. Upon review, BellSouth determined that portions of BellSouth's Supplemental Response to First Request for Production of Documents, Item No. 3, were not proprietary. Specifically, BellSouth is withdrawing its previous request with regard to Attachment B.

BellSouth is hereby filing a Replacement Request for Specified Confidential Classification to address Request for Production of Documents, Item No. 3. This request replaces the original request filed on March 6, 2006.

- 3. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Replacement Request for Specified Confidential Classification because Attachment A to Request for Production of Documents, Item No. 3, BellSouth provided in its supplemental response to MetroPCS' First Request for Production of Documents is to be considered confidential and proprietary. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause harm to BellSouth and the ICOs. 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.
- 4. Attachment A to BellSouth's Replacement 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.
- 5. Attachment B to BellSouth's Replacement Request for Confidential Classification is redacted copies of the document containing the confidential information.
- 6. Attachment C to BellSouth's Replacement Request for Confidential Classification is a highlighted copy of the document containing the confidential information.
- 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 10th day of March, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

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COUNSEL FOR BELLSOUTH TELECOMMUNICATIONS, INC.

ATTACHMENT A

BellSouth Telecommunications, Inc. FPSC Docket Nos. 050119-TP and 050125-TP Request for Confidential Classification Page 1 of 1 03/10/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION TO METROPCS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO 3, FILED MARCH 03, 2006 IN FLORIDA DOCKET NOS. 050119-TP and 050125-TP

Explanation of Proprietary Information

1. This information contains customer specific proprietary information that is not publicly available. Specifically, this information relates to a Modified Access-Based Compensation Agreement entered into between BellSouth and Vista-United Telecommunications. This is a negotiated agreement that is not subject to any filing requirements. As such, this agreement is considered proprietary by the parties to such agreement. Accordingly the agreement is exempt from disclosure pursuant to Section 364.183 (3)(d).

Production of Documents, Item No. 3

Location	<u>Reason</u>
Attachment A, Entire Document	1

ATTACHMENT B
BellSouth Telecommunications, Inc.
FPSC Docket Nos. 050119-TP and 050125-TP
Request for Confidential Classification
Page 1 of 1
03/10/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION TO METROPCS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, ITEM NO 3, FILED MARCH 03, 2006 IN FLORIDA DOCKET NOS. 050119-TP and 050125-TP

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

BellSouth Telecommunications, Inc. Florida Public Service Commission Docket Nos. 050119-TP & 050125-TP MetroPCS' 1st Request for Production JANUARY 27, 2006 SUPPLEMENT RESPONSE Item No. 3 ATTACHMENT A

ATTACHMENT A (ENTIRE DOCUMENT REDACTED FOR PUBLIC DISCLOSURE)