

Robert A. Culpepper

Senior Regulatory Counsel  
BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0841

March 14, 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: Docket No. 050119-TL and 050125-TP**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its *Second Supplemental Responses to MetroPCS' First Set of Interrogatories Nos. 3 and 5*, 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

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

624218

DOCUMENT NUMBER-CATL

02214 MAR 14 8

FPSC-COMMISSION CLERK

William R. Atkinson  
Sprint Nextel  
3065 Cumberland Circle, SE  
Mailstop GA ATLD0602  
Atlanta, GA 30339

Michele K. Thomas, Esq.  
Sr. Corporate Counsel  
T-Mobile  
60 Wells Avenue  
Newton, MA 02459  
Tel. No. (617) 630-3126  
Fax. No. (617) 630-3187  
[Michele.Thomas@T-Mobile.com](mailto:Michele.Thomas@T-Mobile.com)

Floyd Self, Esq.  
Messer, Caparelo & Self  
Hand: 215 S. Monroe Street, Ste. 701  
Tallahassee, FL 32301  
Mail: P.O. Box 1876  
Tallahassee, FL 32302-1876  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
[fself@lawfla.com](mailto:fself@lawfla.com)

Charles F. Palmer  
Troutman Sanders LLP  
600 Peachtree Street, N.E.  
Suite 5200  
Atlanta, GA 30308-2216  
Tel. No. (404) 885-3402  
Fax. No. (404) 962-6647  
[charles.palmer@troutmansanders.com](mailto:charles.palmer@troutmansanders.com)

Elaine Critides  
Verizon Wireless  
Legal & External Affairs Department  
1300 I Street, N.W. – Suite 400 West  
Washington, D.C. 20005  
Tel. No. (202) 589-3756  
Fax. No. (202) 589-3750  
[elaine.critides@verizonwireless.com](mailto:elaine.critides@verizonwireless.com)

Michael A. Gross  
VP – Reg. Affairs & Reg. Counsel  
Florida Cable Telecomm. Assn.  
246 E. 6<sup>th</sup> Avenue, Suite 100  
Tallahassee, FL 32303  
Tel. No. (850) 681-1990  
Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

  
Robert A. Culpepper

**(+) Signed Protective Agreement**

**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 14th day of March, 2006 to the following:

Felicia Banks  
Laura King  
Michael Barrett  
Staff Counsels  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)  
[mbarrett@psc.state.fl.us](mailto:mbarrett@psc.state.fl.us)  
[lking@psc.state.fl.us](mailto:lking@psc.state.fl.us)

Stephen B. Rowell, Esq.  
ALLTEL  
One Allied Drive, B5F11  
Little Rock, AR 72202  
Tel. No. (501) 905-8460  
Fax. No. (501) 905-4443  
[stephen.b.rowell@alltel.com](mailto:stephen.b.rowell@alltel.com)

Benjamin H. Dickens, Esq.  
Blooston, Mordokofsky, Jackson  
& Dickens  
2120 L Street, N.W. Suite 300  
Washington, DC 20037  
Tel. No. (202) 828-5510  
Fax. No. (202) 828-5568  
[bhd@bloostonlaw.com](mailto:bhd@bloostonlaw.com)

Kenneth A. Hoffman, Esq.  
Martin P. McDonnell, Esq.  
Marsha E. Rule, Esq.  
Rutledge, Ecenia, Purnell & Hoffman  
215 South Monroe Street, Suite 420  
Tallahassee, FL 32301  
Tel. No. (850) 681-6788  
Fax. No. (850) 681-6515  
[ken@reuphlaw.com](mailto:ken@reuphlaw.com)  
[marty@reuphlaw.com](mailto:marty@reuphlaw.com)  
[marsha@reuphlaw.com](mailto:marsha@reuphlaw.com)

Tracy Hatch Esq.  
AT&T Communications of the Southern  
States, LLC  
101 North Monroe Street, #700  
Tallahassee, FL 32301-1546  
Tel. No.: (850) 425-6309  
Fax No.: (832) 213-0204  
[thatch@att.com](mailto:thatch@att.com)

ALLTEL Florida, Inc.  
Mr. James White  
6867 Southpoint Drive, N., Suite 103  
Jacksonville, FL 32216-8005  
Tel. No.: (904) 470-4769  
Fax No.: (904) 296-6892  
[james.white@alltel.com](mailto:james.white@alltel.com)

J. Jeffrey Wahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302  
Tel. No. (850) 425-5471  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
Atty. for ALLTEL Florida, Inc.

Frontier Communications  
of the South, Inc.  
Ms. Angie McCall  
Senior Regulatory Analyst  
300 Bland Street  
P. O. Box 770  
Bluefield, WV 24701  
Tel. No. (304) 325-1688  
Fax. No. (304) 325-1483  
[amccall@czn.com](mailto:amccall@czn.com)

GT Com  
Mr. R. Mark Ellmer  
P. O. Box 220  
Port St. Joe, FL 32457-0220  
Tel. No.: (850) 229-7315  
Fax No.: (850) 229-5141  
[mellmer@fairpoint.com](mailto:mellmer@fairpoint.com)

ITS Telecommunications Systems, Inc.  
Mr. Robert M. Post, Jr.  
16001 SW Market Street  
Indiantown, FL 34956-0277  
Tel. No.: (772) 597-3113  
Fax No.: (772) 597-2110  
[maryannh@itstelecom.net](mailto:maryannh@itstelecom.net)

NEFCOM  
Ms. Deborah Nobles  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073-9409  
Tel. No.: (904) 688-0029  
Fax No.: (904) 688-0025  
[dnobles@townes.net](mailto:dnobles@townes.net)

Lynn B. Hall  
Smart City Telecom  
3100 Bonnett Creek Road  
Lake Buena Vista, FL  
Tel. No.: (407) 828-6730  
FAX: (407) 828-6734  
[lbhall@smartcity.com](mailto:lbhall@smartcity.com)

TDS Telecom/Quincy Telephone  
Mr. Thomas M. McCabe  
P. O. Box 189  
Quincy, FL 32353-0189  
Phone: (850) 875-5207  
FAX: 875-5225  
[Thomas.mccabe@tdstelecom.com](mailto:Thomas.mccabe@tdstelecom.com)

Charles V. Gerkin, Jr. (+)  
FRIEND, HUDAK & HARRIS, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346  
Tel. No. (304) 325-1688  
Fax. No. (304) 325-1483  
[cgerkin@fh2.com](mailto:cgerkin@fh2.com)  
Represents MetroPCS

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond  
& Sheehan, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
Tel. No. (850) 681-3828  
Fax. No. (850) 681-8788  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)  
Atty. for NuVox  
Atty. for CompSouth  
Atty. for MetroPCS  
Atty. Sprint Nextel

Susan J. Berlin  
NuVox Communications, Inc.  
Two North Main Street  
Greenville, S.C. 29601  
Tel. No. (864) 331-7323  
Fax. No. (864) 672-5105  
[sberlin@nuvox.com](mailto:sberlin@nuvox.com)

Ronald W. Gavillet  
Neutral Tandem-Florida, LLC  
One South Wacker, Suite 200  
Chicago, IL 60606  
Tel. No. (312) 384-8000  
Fax. No. (312) 346-3276

**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 14, 2006
	)	

**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 March 14, 2006, BellSouth filed its Second Supplemental Responses to Metro PCS' First Set of Interrogatories, Nos. 3 and 5, dated January 27, 2006. Portions of BellSouth's Supplemental Response, in particular, Metro PCS' minutes of use, is the confidential business information of Metro PCS.

2. Therefore, pursuant to Rule 25-22.06(3)(a), BellSouth files this Request for Specified Confidential Classification, to request that the minutes of use of Metro PCS should be classified as Metro PCS 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 and identifies the location of the information designated confidential.

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

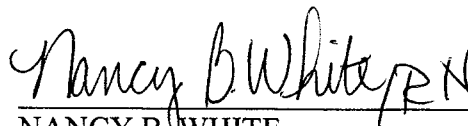
5. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

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 14<sup>th</sup> day of March, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

NANCY B. WHITE

MANUEL GURDIAN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

Handwritten signature of R. Douglas Lackey in cursive, followed by the initials "RN" in a stylized font.

R. DOUGLAS LACKEY

JOHN TYLER

ROBERT CULPEPPER

Suite 4300, BellSouth Center

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0757

COUNSEL FOR BELLSOUTH  
TELECOMMUNICATIONS, INC.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 050119-TP/050125-TP  
Request for Confidential Classification  
Page 1 of 1  
3/14/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO METRO PCS' FIRST SET OF  
INTERROGATORIES PER COMMISSION ORDER ON MOTION TO COMPEL, IN  
FLORIDA DOCKET NO. 050419-TP**

**Explanation of Proprietary Information**

1. This information is the confidential business information of Metro PCS. In particular, this information contains minutes of use of Metro PCS.

**BellSouth Supplemental Response per Motion to Compel**

<u>Columns:</u>	<u>Reason</u>
Total MOU	1



**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 050119-TP/050125-TP  
Request for Confidential Classification  
Page 1 of 1  
3/14/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO METRO PCS' FIRST SET OF  
INTERROGATORIES PER COMMISSION ORDER ON MOTION TO COMPEL, IN  
FLORIDA DOCKET NO. 050419-TP**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**METRO PCS Originated Transit Traffic (NOV 2005)**  
**Terminating Third Party                      Total MOU**

Terminating Third Party	Total MOU
Third Party #1	
Third Party #2	
Third Party #3	
Third Party #4	
Third Party #5	
Third Party #6	
Third Party #7	
Third Party #8	
Third Party #9	
Third Party #10	
Third Party #11	
Third Party #12	
Third Party #13	
Third Party #14	
Third Party #15	
Third Party #16	
Third Party #17	
Third Party #18	
Third Party #19	
Third Party #20	
Third Party #21	
Third Party #22	
Third Party #23	
Third Party #24	
Third Party #25	
Third Party #26	
Third Party #27	
Third Party #28	
Third Party #29	
Third Party #30	
Third Party #31	
Third Party #32	
Third Party #33	
Third Party #34	
Third Party #35	
Third Party #36	
Third Party #37	
Third Party #38	
Third Party #39	
Third Party #40	
Third Party #41	
Third Party #42	
Third Party #43	
Third Party #44	
Third Party #45	
Third Party #46	
Third Party #47	
Third Party #48	
Third Party #49	
Third Party #50	
<b>TOTAL</b>	

SUPPLEMENTAL RESPONSE PER MOTION TO COMPEL  
ATTACHMENT

**METRO PCS Originated Transit Traffic (NOV 2005)**

Terminating Third Party	Total MOU
Third Party #1	
Third Party #2	
Third Party #3	
Third Party #4	
Third Party #5	
Third Party #6	
Third Party #7	
Third Party #8	
Third Party #9	
Third Party #10	
Third Party #11	
Third Party #12	
Third Party #13	
Third Party #14	
Third Party #15	
Third Party #16	
Third Party #17	
Third Party #18	
Third Party #19	
Third Party #20	
Third Party #21	
Third Party #22	
Third Party #23	
Third Party #24	
Third Party #25	
Third Party #26	
Third Party #27	
Third Party #28	
Third Party #29	
Third Party #30	
Third Party #31	
Third Party #32	
Third Party #33	
Third Party #34	
Third Party #35	
Third Party #36	
Third Party #37	
Third Party #38	
Third Party #39	
Third Party #40	
Third Party #41	
Third Party #42	
Third Party #43	
Third Party #44	
Third Party #45	
Third Party #46	
Third Party #47	
Third Party #48	
Third Party #49	
Third Party #50	
<b>TOTAL</b>	

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 050119-TP/050125-TP  
Request for Confidential Classification  
Page 1 of 1  
3/14/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO METRO PCS' FIRST SET OF  
INTERROGATORIES PER COMMISSION ORDER ON MOTION TO COMPEL, IN  
FLORIDA DOCKET NO. 050419-TP**

**ONE HIGHLIGHTED COPY**