

ORIGINAL

RECEIVED FPSC  
Legal Department

Manuel A. Gurdian  
Attorney

06 NOV -3 PM 4:32

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

COMMISSION  
CLERK

November 3, 2006

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. 060598-TL: Petition by BellSouth Telecommunications, Inc., pursuant to Florida Statutes §364.051(4), to Recover 2005 Tropical System Related Costs and Expenses**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for its Responses to CompSouth's First Request for Production of Documents Nos. 4 and 5, in the captioned docket.

Copies of this letter will be served to the parties shown on the attached Certificate of Service.

Sincerely,

*Manuel A. Gurdian (SFG)*  
Manuel A. Gurdian

cc: Jerry D. Hendrix  
E. Earl Edenfield, Jr.  
James Meza III

CMP   1    
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL   1    
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC   1    
OTH   1  

*conf records*

RECEIVED & FILED  
*GN*  
FPSC-BUREAU OF RECORDS

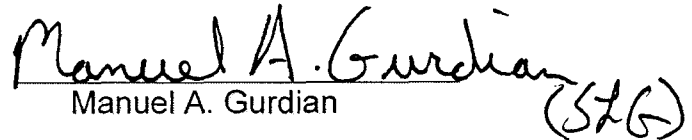
DOCUMENT NUMBER-DATE  
10203 NOV-3 8  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 060598-TL**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and (\*) Federal Express or First Class U. S. Mail this 3rd day of November, 2006 to the following:

Patrick Wiggins  
Adam Teitzman  
Felicia Banks  
Theresa Lee Eng Tan  
Staff Counsels  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[pwiggins@psc.state.fl.us](mailto:pwiggins@psc.state.fl.us)  
[ateitzma@psc.state.fl.us](mailto:ateitzma@psc.state.fl.us)  
[fbanks@psc.state.fl.us](mailto:fbanks@psc.state.fl.us)  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)

NuVox Communications, Inc.  
Susan J. Berlin (+) (\*)  
Two North Main Street  
Greenville, SC 29601  
Phone: 864-331-7323  
FAX: 864-672-5105  
[sberlin@nuvox.com](mailto:sberlin@nuvox.com)

  
Manuel A. Gurdian

(+) Signed Protective Agreement

Charlie Beck  
Deputy Public Counsel  
Office of Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Fax No. (850) 488-4491  
[Beck.Charles@leg.state.fl.us](mailto:Beck.Charles@leg.state.fl.us)

Vicki Gordon Kaufman (+) (\*)  
Moyle Flanigan Katz Raymond  
& Sheehan, PA  
118 North Gadsden Street  
Tallahassee, FL 32301  
(850) 681-3828  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)  
Represents NuVox  
Represents CompSouth

**FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition to recover 2005 tropical system ) Docket No. 060598-TL  
related costs and expenses, by BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: November 3, 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 October 13, 2006, after the appropriate non-disclosure agreement was executed between BellSouth and CompSouth, BellSouth provided CompSouth with confidential, proprietary documents responsive to CompSouth's First Request for Production of Documents Nos. 4 and 5.

2. Pursuant to Order No. 06-0783-PCO-TL, BellSouth is obligated to provide a copy of discovery responses served on other parties to Commission Staff. On October 13, 2006, BellSouth filed its Responses to CompSouth's First Request for Production of Documents Nos. 4 and 5 with Commission Staff under a Notice of Intent.

3. Because the information provided in BellSouth's response contains confidential and proprietary information, BellSouth is now filing this Request for Specified Confidential Classification 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.

DOCUMENT NUMBER-DATE

10203 NOV-3 06

FPSC-COMMISSION CLERK

4. 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.

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

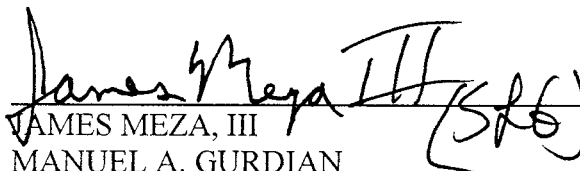
6. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

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.

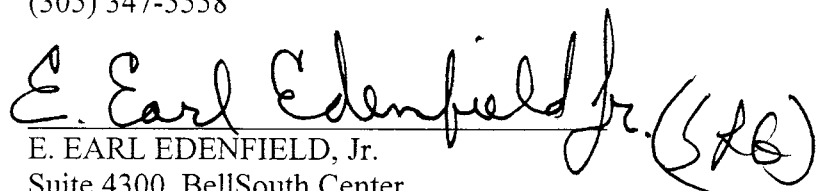
WHEREFORE, based on the foregoing, BellSouth respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 3<sup>rd</sup> day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (SFB)

JAMES MEZA, III  
MANUEL A. GURDIAN  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

 (SFB)

E. EARL EDENFIELD, Jr.  
Suite 4300, BellSouth Center  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0763

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**FPSC Dkt No. 060598-TL**  
**Request for Confidential Classification**  
**Page 1 of 2**  
**11/3/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO COMPSOUTH'S FIRST REQUEST FOR PRODUCTION NOS. 4 AND 5, FILED  
OCTOBER 13, 2006**

**Explanation of Proprietary Information**

1. This information is proprietary and confidential business information used by BellSouth in conducting its business, and not commonly known by or available to the public. Specifically, this information contains confidential business information, regarding BellSouth's insurance policies, coverages, and premiums.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
Page 1 of 2  
11/3/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO COMPSOUTH'S FIRST REQUEST FOR PRODUCTION NOS. 4 AND 5, FILED  
OCTOBER 13, 2006**

**POD No. 4**

	<u>Reason</u>
Entire Page Bates Range COMPSOUTHS1stPOD000009 1	1

**POD No. 5**

	<u>Reason</u>
Entire Page Bates Range COMPSOUTHS1stPOD000012-18	1
Entire Page Bates Range COMPSOUTHS1stPOD000021-25	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
Page 1 of 1  
11/3/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO COMPSOUTH'S FIRST REQUEST FOR PRODUCTION NOS. 4 AND 5, FILED  
OCTOBER 13, 2006**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 060598-TL  
CompSouth's 1<sup>st</sup> Request for Production  
September 15, 2006  
Item No. 4  
ATTACHMENT

**PROPRIETARY**  
(Redacted)



PAGE

REDACTED

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 060598-TL  
CompSouth's 1<sup>st</sup> Request for Production  
September 15, 2006  
Item No. 5  
ATTACHMENT

**PROPRIETARY**

**12/1/2004 –  
12/1/2005**

PAGE  
Redacted

PAGE

REDACTED

Page

Redacted

Page

Redacted

PAGE

REDACTED



Page

Redacted

Page

REDACTED



---

**12/1/2005 –  
12/1/2006**

PAGE

REDACTED

PAGE

REDACTED

PAGE

REDACTED

PAGE

REDACTED



PAGE

Redacted

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 060598-TL  
CompSouth's 1<sup>st</sup> Request for Production  
September 15, 2006  
Item No. 4  
ATTACHMENT

**PROPRIETARY**  
(Redacted)

PAGE

REDACTED

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 060598-TL  
CompSouth's 1<sup>st</sup> Request for Production  
September 15, 2006  
Item No. 5  
ATTACHMENT

**PROPRIETARY**

---

**12/1/2004 –  
12/1/2005**

PAGE

REDACTED

PAGE

REDACTED

Page

REDACTED



Page

Redacted

PAGE

REDACTED

Page

Redacted

Page

REDACTED

COMPSOUTHS1stPOD000019

**12/1/2005 –  
12/1/2006**

PAGE

REDACTED

PAGE  
REDACTED



PAGE

REDACTED

PAGE

REDACTED

PAGE

Redacted

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
Page 1 of 1  
11/3/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO COMPSOUTH'S FIRST REQUEST FOR PRODUCTION NOS. 4 AND 5, FILED  
OCTOBER 13, 2006**

**ONE HIGHLIGHTED COPY**