

ORIGINAL

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Manuel A. Gurdian
Attorney

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

COMMISSION
CLERK

November 20, 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 *Revised* Response to Staff's First Request for Production of Documents No. 2.

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

Sincerely,

Manuel A. Gurdian (576)
Manuel A. Gurdian

CMP 1

COM _____

CTR _____

ECR _____ cc: Jerry D. Hendrix
E. Earl Edenfield, Jr.

GCL 1 James Meza III

OPC _____

RCA _____

SCR _____

SGA _____

SEC 1

OTH 1 con
records

DOCUMENT NUMBER-DATE

10648 NOV 20 06

FPSC-COMMISSION CLERK

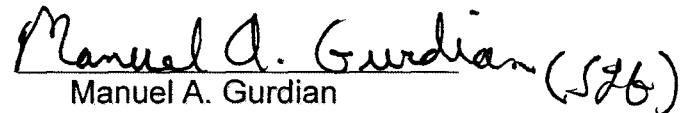
**CERTIFICATE OF SERVICE
Docket No. 060598-TL**

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

(*) Electronic Mail and Federal Express this 20th day of November, 2006 to the following:

Patrick Wiggins
Adam Teitzman
Felicia West
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
ateitzma@psc.state.fl.us
fbanks@psc.state.fl.us
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


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

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

ORIGINAL

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 20, 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 6, 2006, BellSouth filed its Response and Objections to Staff's First Set of Interrogatories (Nos. 1-12) and First Request for Production of Documents (Nos. 1-3).

2. On November 20, 2006, BellSouth filed a Revised Response to Staff's First Request for Production of Documents No. 2. BellSouth's Revised Response to Staff's First Request for Production, No. 2 contains information that has been designated "confidential" and is proprietary to BellSouth.

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.

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.

DOCUMENT NUMBER-DATE

10648 NOV 20 8

FPSC-COMMISSION CLERK

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 20th day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.


JAMES MEZA, III

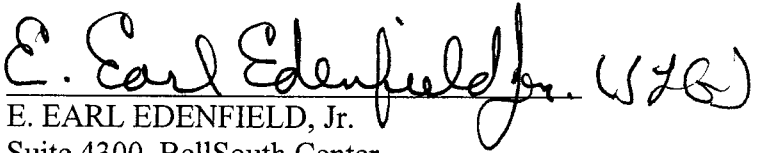
MANUEL A. GURDIAN

c/o Nancy H. Sims

150 So. Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558


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
11/20/06

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED
RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST REQUEST FOR PRODUCTION NO. 2, FILED NOVEMBER 20, 2006**

Explanation of Proprietary Information

1. This information contains confidential, proprietary business information of BellSouth. BellSouth strives to keep this information confidential and not publicly disclose the information. Specifically, this information contains in service quantities and revenues broken down by types of service. If this information were disclosed publicly, it would damage the competitive interests of BellSouth.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Dkt No. 060598-TL
Request for Confidential Classification
Page 1 of 2
11/20/06**

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REVISED POD No. 2

	<u>Reason</u>
Bates STAFFS1stPOD000008 Lines 2-5, 7-10	1
Bates STAFFS1stPOD000009-11 Column UM(INSERV)	1

ATTACHMENT B

BellSouth Telecommunications, Inc.
FPSC Dkt No. 060598-TL
Request for Confidential Classification
Page 1 of 1
11/20/06

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED
RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST REQUEST FOR PRODUCTION NO. 2, FILED NOVEMBER 20, 2006**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
Staff's 1st Request for Production
September 21, 2006
REVISED Item No. 2
ATTACHMENT

PROPRIETARY

Florida Storm Cost Recovery

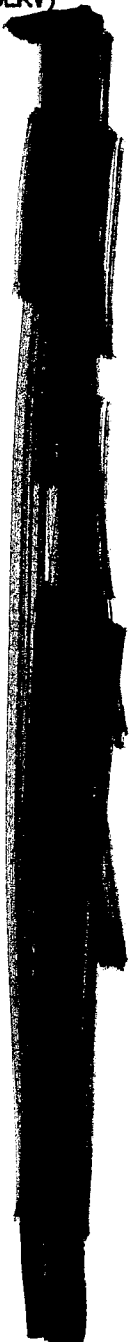
Updated as of 11/15/06

Estimated Florida Storm Cost Recovery Amount					
Retail Basic and Nonbasic Services					
(Access Line data as of June 2006)					
State		Access Lines	Monthly Revenue	Annual Revenue	
FL	Residence Lines	3,413,192	\$1,706,596.00	\$20,479,152	
FL	[REDACTED]	1,149,266	\$574,633.00	\$6,895,596	
FL	[REDACTED]	27,445	\$13,722.50	\$164,670	
FL	[REDACTED]	39,765	\$19,882.50	\$238,590	
FL	[REDACTED]	33,339	\$16,669.50	\$200,034	
FL	COCOTS Lines	4,131	\$2,065.50	\$24,786	
FL	[REDACTED]	243,529	\$121,764.50	\$1,461,174	
FL	[REDACTED]	468	\$234.00	\$2,808	
FL	[REDACTED]	2,436	\$1,218.00	\$14,616	
FL	[REDACTED]	61,492	\$30,746.00	\$368,952	
Total		4,975,063	\$2,487,531.50	\$29,850,378	
Highlighting denotes proprietary information					
Estimated Florida Storm Cost Recovery Amount					
Wholesale Unbundled Loops					
(Loop data as of June 2006)					
State	Loop Type	Number in Service June 2006	Number to Apply Surcharge*	Monthly Revenue	Annual Revenue
FL	601 UNE UDL 4-Wire	3	3	\$1.50	\$18.00
FL	602 UNE UVL 2 WD	28,375	28,375	\$14,187.50	\$170,250.00
FL	603 UNE UVL 4 WD	1	1	\$0.50	\$6.00
FL	604 UNE UDL 2-Wire ISDN	5,353	5,353	\$2,676.50	\$32,118.00
FL	609 UNE UDL 2-Wire HDSL	993	993	\$496.50	\$5,958.00
FL	610 UNE UDL 2-Wire ADSL	5,229	5,229	\$2,614.50	\$31,374.00
FL	618 UNE UVL 2-Wire	166,863	166,863	\$83,431.50	\$1,001,178.00
FL	645 UNE Non Loaded Copper Loop	168	168	\$84.00	\$1,008.00
FL	684 Unbundled Copper Loop - ND	84	84	\$42.00	\$504.00
FL	606 UNE UDL 4-W DS1/ISDN	16,353	179,883	\$89,941.50	\$1,079,298.00
FL	659 UNE Combo Local Loop DS1	8,016	88,176	\$44,088.00	\$529,056.00
FL	607 UNE UDL DS3	4	1,260	\$630.00	\$7,560.00
FL	660 UNE Combo Local Loop DS3	4	1,260	\$630.00	\$7,560.00
Total		231,446	477,648	\$238,824.00	\$2,865,888.00
Grand Total					\$32,716,266.00
* DS1 and DS3 counts based on applying 47% Utilization Factor (DS1 = 11 equiv. loops; DS3 = 315 equiv. loops)					

10-28-06

June 2006

USOC	MKT	SUM(INSERV)
1LDPZ	R	
1LDPZ	W	
1RSD2	R	
1RSD3	R	
1RSD3	W	
1RSD4	R	
1RSD5	R	
1RSD5	W	
1RSD6	R	
1RSD6	W	
1RSD9	R	
1RSD9	W	
ATA1F	R	
ATA4F	R	
ATA7F	R	
ATA7M	R	
ATAA1	R	
ATAA3	R	
ATAA4	R	
ATAA6	R	
ATAA7	R	
ATAAA	R	
ATACM	R	
ATACS	R	
ATAEA	R	
ATAG3	R	
ATAG4	R	
ATAG6	R	
ATANK	R	
ATANM	R	
ATANS	R	
ATAT8	R	
ATAUS	R	
ATAVK	R	
ATAVM	R	
ATAVS	R	
FDKXE	R	
FRH11	R	
FRH11	W	
FRH12	R	
FRH12	W	
FRH15	R	
FRH15	W	



June 2006

USOC	MKT	SUM(INSERV)
FRH18	R	
FRH19	R	
FRH19	W	
FRH10	R	
FRH10	W	
FRH21	R	
FRH21	W	
FRH24	R	
FRH24	W	
FRH25	R	
FRH25	W	
FRH27	R	
FRH27	W	
FRH2M	R	
FRH2M	W	
FRH32	R	
FRH32	W	
FRH38	R	
FRH38	W	
FRH30	R	
FRH40	R	
FRH51	R	
FRH51	W	
FRH56	R	
FRH56	W	
FRH57	R	
FRH5M	R	
FRH64	R	
FRH64	W	
FRH76	R	
FRH76	W	
FRHFS	R	
FRHM3	R	
FRHM3	W	
FRHM6	R	
FRHM9	R	
FRHO3	R	
FRHO6	R	
FRHO6	W	
FRHO9	R	
FRHS1	R	
FRHS1	W	
FRHS2	R	
FRHS2	W	

June 2006		
USOC	MKT	SUM(INSERV)
FRHS3	R	
FRHS5	R	
FRHS5	W	
FRHS7	R	
FRHSE	R	
FRHT1	R	
FRHT1	W	
FRHT3	R	
HFQ4N	R	
HFQ5N	R	
HFS12	R	
HFS1C	R	
HFS1W	R	
HFS48	R	
HFS4C	R	
HFSC7	R	
HFSO3	R	
HFSOC	R	
HFSOW	R	
HFST1	R	
MTEBZ	R	
MTEDZ	R	
MTEPZ	R	
NMLBL	R	
NMLEN	R	
NMLG7	R	
P2JGX	R	
P2JHX	R	
P2JHX	W	
P2JKX	R	
P2JKX	W	
P2JLX	R	
P2JMX	R	
P2JMX	W	
P2JNX	R	
P2JNX	W	
P2JQX	R	
P2JQX	W	
P2JRX	R	
P2JRX	W	
P2JUX	R	
P2JUX	W	

June 2006		
USOC	MKT	SUM(INSERV)
P2JWX	R	
SHNC1	R	
SHNC3	R	
SHNH1	R	
SHNH3	R	
SHNH5	R	
SHNH6	R	
SHNH7	R	
SHNH8	R	
SHNH9	R	
SHNN2	R	
SHNN5	R	
SHNN6	R	
SHNN8	R	
SHNN9	R	
CAR2T	R	
CAROT	R	
MTEBZ	R	
MTEDZ	R	
MTEPZ	R	
NMLBL	R	
NMLEN	R	
NMLG7	R	
Total	R & W	

Retail Only	
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BellSouth Telecommunications, Inc.
Florida Public Service Commission
Docket No. 060598-TL
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Updated as of 11/15/06

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Grand Total					\$32,716,266.00
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T-08-00-000-0000

June 2006

USOC	MKT	SUM(INSERV)
1LDPZ	R	
1LDPZ	W	
1RSD2	R	
1RSD3	R	
1RSD3	W	
1RSD4	R	
1RSD5	R	
1RSD5	W	
1RSD6	R	
1RSD6	W	
1RSD9	R	
1RSD9	W	
ATA1F	R	
ATA4F	R	
ATA7F	R	
ATA7M	R	
ATAA1	R	
ATAA3	R	
ATAA4	R	
ATAA6	R	
ATAA7	R	
ATAAA	R	
ATACM	R	
ATACS	R	
ATAEA	R	
ATAG3	R	
ATAG4	R	
ATAG6	R	
ATANK	R	
ATANM	R	
ATANS	R	
ATAT8	R	
ATAUS	R	
ATAVK	R	
ATAVM	R	
ATAVS	R	
FDKXE	R	
FRH11	R	
FRH11	W	
FRH12	R	
FRH12	W	
FRH15	R	
FRH15	W	

REVISED

STAFFS1stPOD000009

June 2006

USOC	MKT	SUM(INSERV)
FRH18	R	
FRH19	R	
FRH19	W	
FRH10	R	
FRH10	W	
FRH21	R	
FRH21	W	
FRH24	R	
FRH24	W	
FRH25	R	
FRH25	W	
FRH27	R	
FRH27	W	
FRH2M	R	
FRH2M	W	
FRH32	R	
FRH32	W	
FRH38	R	
FRH38	W	
FRH30	R	
FRH40	R	
FRH51	R	
FRH51	W	
FRH56	R	
FRH56	W	
FRH57	R	
FRH5M	R	
FRH64	R	
FRH64	W	
FRH76	R	
FRH76	W	
FRHFS	R	
FRHM3	R	
FRHM3	W	
FRHM6	R	
FRHM9	R	
FRHO3	R	
FRHO6	R	
FRHO6	W	
FRHO9	R	
FRHS1	R	
FRHS1	W	
FRHS2	R	
FRHS2	W	

REVISED

STAFFS1stPOD000010

		June 2006	
USOC		MKT	SUM(INSERV)
FRHS3	R		
FRHS5	R		
FRHS5	W		
FRHS7	R		
FRHSE	R		
FRHT1	R		
FRHT1	W		
FRHT3	R		
HFQ4N	R		
HFQ5N	R		
HFS12	R		
HFS1C	R		
HFS1W	R		
HFS48	R		
HFS4C	R		
HFSC7	R		
HFSO3	R		
HFSOC	R		
HFSOW	R		
HFST1	R		
MTEBZ	R		
MTEDZ	R		
MTEPZ	R		
NMLBL	R		
NMLEN	R		
NMLG7	R		
P2JGX	R		
P2JHX	R		
P2JHX	W		
P2JKX	R		
P2JKX	W		
P2JLX	R		
P2JMX	R		
P2JMX	W		
P2JNX	R		
P2JNX	W		
P2JQX	R		
P2JQX	W		
P2JRX	R		
P2JRX	W		
P2JUX	R		
P2JUX	W		

		June 2006	
USOC		MKT	SUM(INSERV)
P2JWX	R		
SHNC1	R		
SHNC3	R		
SHNH1	R		
SHNH3	R		
SHNH5	R		
SHNH6	R		
SHNH7	R		
SHNH8	R		
SHNH9	R		
SHNN2	R		
SHNN5	R		
SHNN6	R		
SHNN8	R		
SHNN9	R		
CAR2T	R		
CAROT	R		
MTEBZ	R		
MTEDZ	R		
MTEPZ	R		
NMLBL	R		
NMLEN	R		
NMLG7	R		
Total	R & W		

Retail Only

ATTACHMENT C

**BellSouth Telecommunications, Inc.
FPSC Dkt No. 060598-TL
Request for Confidential Classification
Page 1 of 1
11/20/06**

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