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# BELLSOUTH

OMMISSION CLERK

BellSouth Telecommunications, Inc.

Suite/Floor 1910 150 W. Flagler St. Miami, FL 33130-1536 James Meza

General Counsel - Florida

James.Meza@BellSouth.com

(305) 347-5558

November 28, 2006

Mrs. Blanca S. Bayo Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 030867-TL 030868-TL 030869-TL 030961-TI

Re: Request for Specified Confidential Classification (BellSouth Long Distance, Inc. Flow-through Filing)

Dear Ms. Bayo:

Enclosed are an original and fifteen copies of BellSouth Long Distance, Inc.'s request for Specified Confidential Classification for its proprietary letter and worksheet, which are being submitted to the Division of Competitive Markets and Enforcements today. Please file this request in the captioned docket.

CMP A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return
COMthe copy to me.
CTRSincerely.
ECR
GCL
OPC James Meza
RCA James Maza mas
SCREnclosures
SGA
SEC

DOCUMENT NUMBER-DATE

10836 HOV 28 8

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

	)	
Request for Specified Confidential Classification	)	
BellSouth Long Distance, Inc. Flow-through Filing	)	Filed: November 28, 2006
	1	

# BELLSOUTH LONG DISTANCE, INC.'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

COMES NOW, BellSouth Long Distance, Inc. ("BellSouth Long Distance"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On October 31, 2005, in conjunction with Docket No. 030961-T1, Order No. PSC-03-1469-FOF-TL and Florida Statue §364.163(2), BellSouth Long Distance filed flow-through tariff revisions for the 2005-2006 rebalance plan period with the Division of Competitive Markets and Enforcements. Contemporaneously herewith, BellSouth Long Distance hereby files a letter describing its intention to continue its previously implemented 2005 reductions in the 2006-2007 rebalance plan period. The continuation of these reductions will satisfy the flow through requirements resulting from the Embarq and Verizon access reductions, as well as some or all of the flow through that will be required by yet to be filed access reductions by BellSouth Telecommunications, Inc. Because continuation of its previously implemented flow through reductions will satisfy its current obligations, BellSouth Long Distance is not making any additional price reduction filing at this time. Information provided in BellSouth Long Distance's letter and associated worksheet is considered proprietary, confidential business information and should not be disclosed.

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FPSC-COMMISSION CLERK

- 2. Pursuant to Rule 25-22.06(3)(a), BellSouth Long Distance hereby files this
  Request for Specified Confidential Classification because the information contained in BellSouth
  Long Distance's letter and worksheet includes confidential business information utilized by
  BellSouth Long Distance to conduct business. A more specific description of this information is
  contained in Attachment A. Public disclosure of this information would cause competitive harm
  to BellSouth Long Distance and provide competitors an unfair advantage. The information
  discussed in the Request for Specified Confidential Classification is valuable and BellSouth
  Long Distance strives to keep it secret. Therefore, such information should be classified as
  confidential business information.
- 3. Attachment A to BellSouth Long Distance'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 Long Distance as confidential.
- 4. Attachment B to BellSouth Long Distance's Request for Confidential Classification are redacted copies of the document containing the confidential information.
- 5. Attachment C to BellSouth Long Distance's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.
- 6. The information discussed in the Request for Specified Confidential Classification is valuable, BellSouth Long Distance treats this information as confidential in all requests, and this information has not been generally disclosed.
- 7. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services.

WHEREFORE, based on the foregoing, BellSouth Long Distance 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 28<sup>th</sup> day of November, 2006.

BELLSOUTH LONG DISTANCE, INC.

James Meza

General Counsel - Florida

#### ATTACHMENT A

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# REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG DISTANCE'S LETTER AND WORKSHEET FILED NOVEMBER 28, 2006

### **Explanation of Proprietary Information**

- 1. This information contains a breakdown of the estimated minutes of switched access traffic, broken down by specific originating or terminating local exchange company, used by the Company. This traffic pattern information is proprietary to BellSouth Long Distance and disclosure would impair the competitive business and cause harm to BellSouth Long Distance. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 2. This information contains a breakdown of the intrastate switched access savings the Company is expected to realize, by local exchange company rate element and by BellSouth Long Distance line of business. This information could be used to derive the Company's traffic patterns and other competitive information. Traffic pattern information is proprietary to BellSouth Long Distance and disclosure would impair the competitive business and cause harm to BellSouth Long Distance. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 3. This information reflects the total dollar amounts of BellSouth Long Distance's intrastate switched access charge reductions. This information is proprietary to the Company as it shows a breakdown by segment of the Company's lines of business and disclosure would impair the competitive business and cause harm to BellSouth Long Distance. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 4. This information contains a breakdown of the estimated number of plan subscribers and estimated number of minutes of use associated with BellSouth Long Distance's intrastate switched access charge reduction flow-through. This information shows subscription and usage levels for various BellSouth Long Distance calling plans and disclosure would impair the competitive business and cause harm to BellSouth Long Distance.

Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

5. This information contains the estimated BellSouth Long Distance's intrastate switched access charge reduction flow-through. This information could be used to derive the subscription and usage levels for various BellSouth Long Distance calling plans and disclosure would impair the competitive business and cause harm to BellSouth Long Distance. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

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# REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG DISTANCE'S LETTER AND WORKSHEET FILED NOVEMBER 28, 2006

## <u>Letter</u>

<u> </u>	<u>Reason</u>
Page 1, Lines 4-10 - dollar amount of estimated annual cost savings for BellSouth Long Distance and flow through dollar amounts for both Verizon and Embarq, based on actual MOUs for Nov. 2005 – Oct. 2006	1 and 2
Page 1, Lines 16-17 - number of customers who benefited from the BellSouth Long Distance reductions and the dollar amount of the savings	4 and 5
Page 1, Lines 18-21 and page 2 line 2 – dollar amount of savings from additional reductions, dollar amount of total savings for the 2005-2006 period and dollar amount of BellSouth Long Distance pass through obligation for the first rebalance period.	
Page 2, Line 4 - dollar amount of expected continued savings for 2005-2006 period new customers	5
Page 2, Lines 6-8, - dollar amount of Verizon and Embarq savings pass through, the dollar amount of savings that will benefit new customers in the 2006-2007 plan year and the dollar amount of the savings for customers from the 2005-2006 plan year	5

## ATTACHMENT A

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# REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG DISTANCE'S LETTER AND WORKSHEET FILED NOVEMBER 28, 2006

# **WORKSHEET**

Location	Reason
Lines 9-10 All MOUs listed in section entitled "Calculation of \$ Savings and % Reduction", in column entitled "Forecast MOUs"	1
Lines 9-13 All dollar amounts listed in section entitled "Calculation of \$ Savings and % Reduction", in columns entitled "Switched Access Savings",	s 2
Lines 37-39 All dollar amounts listed in the section entitled "IXC Summary Information"	3
Lines 18-32 All estimated subscriber counts and estimated minutes of use in section entitled "Savings Spread – Specific Rate Elements" in columns entitled "Estimated EOP Subs" "Estimated MOU",	<b>4</b> ,
Lines 18-32 All dollar amounts listed in section entitled "Savings Spread – Specific Rate Elements" in the columns entitled "Estimated Customer Savings" and the amount shown as Sub-Total Planned" directly below these columns	5

### ATTACHMENT B

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REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF BELLSOUTH LONG DISTANCE'S LETTER AND WORKSHEET FILED NOVEMBER 28, 2006

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

#### Susan Callaghan Senior Director

BellSouth Business Systems 2180 Lake Boulevard Atlanta, GA 30319

November 28, 2006

Ms. Beth Salak
Division of Competitive Markets
and Enforcements
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-085

Dear Ms. Salak,

Pursuant to Florida Law 364.163, BellSouth Long Distance, Inc., ("BellSouth Long Distance") is required to pass through the cost savings received from access reductions under the rebalance legislation.

Verizon and Embarq have completed their 2006 rebalance activities which included access reductions which produce an annual cost savings for BellSouth Long Distance of \$\*\*\*. This expected savings was determined based on the past 12 month actual MOUs (Nov. 2005 – Oct. 2006) multiplied by the amount of the access reductions. (12 months terminating minutes to Verzion and Embarq = \*\*\*\* minutes; Verizon – \*\*\*\*\* minutes X \$0.0084379 = \$\*\*\*; Embarq – \*\*\*\* minutes X \$0.01282 = \$\*\*\*)

Last year, BellSouth Long Distance reduced prices on several plans to give customers the benefit of the 2005 rebalance access savings. The most significant reductions came from \$5.00 to \$7.00 reductions in the intrastate portion of our Consumer unlimited long distance plans and the elimination of intraLATA toll metered charges on our Preferred Rate Plus Plan for small businesses. Over the past year more than \*\*\*\*\* customers have benefited from these reductions resulting in \$\*\*\*\* in savings.

In addition, over \$\*\*\* was passed on to end users via additional reductions, making the total savings passed through to end-users during the 2005-2006 period \$\*\*\*. (The BellSouth Long Distance pass through obligation for the first rebalance period was \$\*\*\*.)

The benefits received by these BellSouth Long Distance customers will continue into the future and are expected to exceed \$\*\*\* over the coming 12 months.

Because of the overwhelming success of these plans, BellSouth Long Distance proposes to pass the \$\*\*\* of cost savings from Verizon's and Embarq's switched access reductions to customers via the continuation of these rate reductions for new customers. We forecast new customers will receive \$\*\*\* to \$\*\*\* of savings over the next 12 months. These savings are in addition to the \$\*\*\* of saving customers who signed up during the 2005-2006 time period are expected to receive.

Once the 2006 BellSouth Telecommunications rebalance is complete, BellSouth Long Distance will take the appropriate action to ensure that additional access cost savings are passed along to end-users if required. No additional price reduction filings will be made by BellSouth Long Distance at this time.

BellSouth Long Distance's monthly tracking report is available for review. The calculation of the estimate for 2006-2007 is included with this submission.

Sincerely, June July July July

Susan Callaghan Senior Director

BellSouth Business Systems

on behalf of BellSouth Long Distance, Inc.