

ORIGINAL

Legal Department

Manuel A. Gurdian  
Attorney

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

RECEIVED FPSC  
06 DEC - 1 PM 3:46  
COMMISSION  
CLERK

December 1, 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 attachment to Staff's Second Set of Interrogatories (No. 20), which we ask  
that you file 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*  
Manuel A. Gurdian

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CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL 1  
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records

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

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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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 First Class U. S. Mail this 1st day of December, 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](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  
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Fax No. (850) 488-4491  
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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

**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: December 1, 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 November 6, 2006, the Staff of the Florida Public Service Commission (Staff) served its Second Set of Interrogatories (Nos. 13-51) and Second Request for Production of Documents (Nos. 4-8) upon BellSouth.

2. On November 21, 2006, BellSouth filed its Response and Objections to Staff's Second Set of Interrogatories (Nos. 13-51) and Second Request for Production of Documents (Nos. 4-8). BellSouth also filed a Notice of Intent as the attachment to Staff's Second Set of Interrogatories, No. 20 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.

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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.

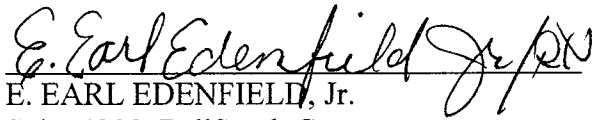
Respectfully submitted this 1<sup>st</sup> day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of James Meza, III in cursive, written over a horizontal line.

JAMES MEZA, III  
MANUEL A. GURDIAN

c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
Tallahassee, FL 32301  
(305) 347-5558

Handwritten signature of E. Earl Edenfield, Jr. in cursive, written over a horizontal line.

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  
12/1/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S SECOND  
SET OF INTERROGATORIES, ITEM NO. 20 (ATTACHMENT), FILED NOVEMBER  
21, 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 and financial information, including, but not limited to, forecasts, and hypothetical situations.
2. This information contains confidential, proprietary business information of BellSouth. BellSouth strives to keep this information confidential and not publicly disclose the information. This information contains detailed budget, financial and strategic information for BellSouth. Disclosure of revenue accounting and business costs could give competitors a clear picture of the resources required to provide services. This information also includes vendor specific information, and/or, vendor specific prices negotiated by BellSouth. Knowledge of such resource requirements could harm the competitive interests of BellSouth and impair BellSouth's ability to contract for goods and services on favorable terms.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
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12/1/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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21, 2006**

**Interrogatory No. 20 (Attachment 1)**

Page 1 of 4, Amounts Column  
Page 1 of 4, Note: lines 1 and 2  
Page 2 of 4, Incremental Intrastate Expense Column  
Page 3 of 4, Columns B,C,D,E,F,G,H,I

Reason

1  
1  
1  
1

**Interrogatory No. 20 (Attachment 2)**

Entire DVD

Reason

2

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
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12/1/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
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SET OF INTERROGATORIES, ITEM NO. 20 (ATTACHMENT), FILED NOVEMBER  
21, 2006**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**



**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
Page 1 of 1  
12/1/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S SECOND  
SET OF INTERROGATORIES, ITEM NO. 20 (ATTACHMENT), FILED NOVEMBER  
21, 2006**

**ONE HIGHLIGHTED COPY**