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Legal Department

Manuel A. Gurdian  
Attorney

06 DEC 13 PM 4:26

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

COMMISSION  
CLERK

December 13, 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: **BellSouth Audit of 2005 Storm Costs; Docket No. 060598-TL;  
ACN 06-255-1-1; Additional Confidential Workpapers**

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for Staff's *supplemental* audit workpapers, which we ask that you file in the captioned docket and audit.

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

Sincerely,

*Manuel A. Gurdian* / RN  
Manuel A. Gurdian

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

cc: Lynn M. Deamer  
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 13th 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)  
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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  
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Moyle Flanigan Katz Raymond  
& Sheehan, PA  
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Tallahassee, FL 32301  
Tel. No. (850) 681-3828  
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[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 13, 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 September 12, 2006, the Staff of the Florida Public Service Commission (Staff) notified BellSouth via letter that it would be conducting an audit of BellSouth's 2005 Storm Costs.

2. On November 22, 2006, Staff provided BellSouth with supplemental audit workpapers that Staff had utilized to report their audit findings in Audit Control No. 06-255-1-1. These documents were being maintained in a Temporary Confidential Status.

3. Because the information provided to Staff in BellSouth's response to various audit requests contain 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.

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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 13<sup>th</sup> day of December, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

JAMES MEZA, III

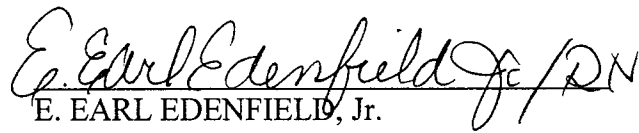
MANUEL A. GURDIAN

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  
2005 Storm Costs Audit  
Request for Confidential Classification  
Page 1 of 2  
12/13/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL AUDIT  
WORKPAPERS PROVIDED BY BELL SOUTH IN RESPONSE TO THE 2005 STORM  
COSTS AUDIT**

**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. 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. Knowledge of such resource requirements could harm the competitive interests of BellSouth.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
 FPSC Dkt No. 060598-TL  
 2005 Storm Costs Audit  
 Request for Confidential Classification  
 Page 2 of 2  
 12/13/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL AUDIT  
 WORKPAPERS PROVIDED BY BELL SOUTH IN RESPONSE TO THE 2005 STORM  
 COSTS AUDIT**

<b>Item</b>	<b>Description</b>	<b>Page</b>	<b>Location</b>	<b>Reason</b>
1	2005 Capital Budget	10-8.8.1	Entire Page	1
2	2006 Capital Budget	10-8.9→10-8.10	Entire Pages	1
3	2005 Expense Budget	10-8.11→10-8.14	Entire Pages	1
4	2006 Expense Budget	10-8.15→10-8.20	Entire Pages	1
5	Capital Budget Acronyms	10-8.21→10-8.24	Entire Pages	1
6	CD Supplemental Doc Req 30 Attachments	10-30.8	Entire CD	1
7	Late Filed Doc Req 33 Invoices	10-33.3→10-33.11	Entire Pages	1
8	Late Filed Doc Req 33 Invoices	10-33.15→10-33.16	Entire Pages	1
9	Late Filed Doc Req 34 Invoices	10-34.2→10-34.7	Entire Pages	1
10	Late Filed Doc Req 34 Invoices	10-34.10→10-34.11	Entire Pages	1
11	2005 Sample of Materials	43-2/1→43-2.2/3	Entire Page	1
12	CD Spreadsheet Audit #28; Vouchers 28,29,32	28,29,32	Entire CD	1
13	CD Material Sample June,Sept,Nov 2005 Doc Req 29	28,29,32	Entire CD	1
14	CD Supplemental Req 8 & 30	10-8.8	Entire CD	1
15	CD Supplemental Req 8 Capital Budgets	10-8.8	Entire CD	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
2005 Storm Costs Audit  
Request for Confidential Classification  
Page 1 of 1  
12/13/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL AUDIT  
WORKPAPERS PROVIDED BY BELLSOUTH IN RESPONSE TO THE 2005 STORM  
COSTS AUDIT**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**



**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL  
AUDIT WORKPAPERS PROVIDED BY BELL SOUTH IN RESPONSE TO THE  
2005 STORM COSTS AUDIT**

**(Item Nos. 1-15)**

**ENTIRE DOCUMENT REACTED**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL  
AUDIT WORKPAPERS PROVIDED BY BELL SOUTH IN RESPONSE TO THE  
2005 STORM COSTS AUDIT**

**(Item Nos. 1-15)**

**ENTIRE DOCUMENT REACTED**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
2005 Storm Costs Audit  
Request for Confidential Classification  
Page 1 of 1  
12/13/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF SUPPLEMENTAL AUDIT  
WORKPAPERS PROVIDED BY BELLSOUTH IN RESPONSE TO THE 2005 STORM  
COSTS AUDIT**

**ONE HIGHLIGHTED COPY**