



ORIGINAL

Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED-PPSC  
FEB 19 PM 3:19  
COMMISSION CLERK  
*[Handwritten signatures]*

**DATE:** February 14, 2007

**TO:** Patrick K. Wiggins, Attorney Supervisor, Office of the General Counsel  
Lee Eng Tan, Attorney, Office of the General Counsel

**FROM:** Melinda H. Watts, Engineering Specialist III, Division of Competitive Markets & Enforcement

**RE:** **BellSouth Telecommunications, Inc.'s Request for Confidential Classification in Docket No. 060650-TL;** Joint petition against BellSouth Telecommunications, Inc., Embarq Florida, Inc., and Verizon Florida Inc. for billing charges unauthorized by Telecommunications Consumer Protection Act and request for refunds, by Citizens of the State of Florida and Attorney General.

On January 10, 2007, BellSouth Telecommunications, Inc. (BellSouth) filed its request pursuant to Rule 25-22.006, F.A.C., and Section 364.183(1), Florida Statutes, for confidential classification and treatment of the information contained in **FPSC Document Number 00269-07** which consists of BellSouth's responses to staff's First Request for Production of Documents, Item 3, Attachment A. BellSouth claims that the information contained in the documents are proprietary for the following reason:

This information contains confidential, proprietary contractual data between BellSouth and third-parties. Specifically, this information relates to Billing Processing Service Clearinghouse Operating Agreements entered into between BellSouth and third-party billing aggregators. These agreements are considered proprietary by the parties to such agreements. The disclosure of this information could impair BellSouth's ability to contract for goods or services on favorable terms. Accordingly the agreements are exempt from disclosure pursuant to Section 364.1 83 (3)(d).

Upon review of the information contained in the documents, technical staff concurs with BellSouth that the information meets the requirements for confidential classification pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006(5), F.A.C., and as such, the information should be treated as confidential.

- GMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH Marquerite

cc: Della Fordham  
Blanca Bayo

DOCUMENT NUMBER-DATE  
01606 FEB 19 07  
FPSC-COMMISSION CLERK

J. Phillip Carver  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0710

ORIGINAL

January 10, 2007

RECEIVED-FPSC  
07 JAN 10 PM 3:32  
COMMISSION  
CLERK

Mrs. Blanca S. Bayó  
Director, Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 060650-TL

In Re: Joint Petition against BellSouth Telecommunications, Inc.,  
Embarq Florida, Inc., and Verizon Florida Inc. for billing charges  
unauthorized by Telecommunications Consumer Protection Act and  
request for refunds, by Citizens of the State of Florida and Attorney  
General

Dear Ms. Bayó:

Enclosed is an original and 15 copies of BellSouth Telecommunications, Inc.'s  
Request for Specified Confidential Classification, which we ask that you file in the  
captioned docket.

Copies have been served to the parties shown on the attached Certificate of  
Service.

*Confidential DNs 00269-07 thru 00273-07*

*Redacted DNs*

*00274-07 thru  
00278-07*

Sincerely,

*J. Phillip Carver/RKS*  
J. Phillip Carver

- CMP
- COM
- CTR
- ECR
- GCL  Enclosure
- OPC
- RCA  cc: All parties of record
- SCR  Jerry D. Hendrix
- SGA  E. Earl Edenfield, Jr.
- SEC
- OTH  *1 copy records*

RECEIVED & FILED

*MW*  
FPSC BUREAU OF RECORDS

*Request CC.*  
DOCUMENT NUMBER-DATE  
00268 JAN 10 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 060650-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U.S. Mail this 10th day of January, 2007 to the following:

Jason Fudge  
Kira Scott  
Patrick Wiggins  
Theresa Tan  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jfudge@psc.state.fl.us](mailto:jfudge@psc.state.fl.us)  
[kscott@psc.state.fl.us](mailto:kscott@psc.state.fl.us)  
[pwiggins@psc.state.fl.us](mailto:pwiggins@psc.state.fl.us)  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)

Embarq Florida, Inc.  
Mr. F. B. (Ben) Poag  
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P.O. Box 2214  
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Fax. No. (850) 878-0777  
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Verizon Florida, Inc.  
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Michael A. Gross  
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Tallahassee, FL 32303  
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Fax. No. (850) 681-9676  
[mgross@fcta.com](mailto:mgross@fcta.com)

  
J. Phillip Carver

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition Against BellSouth, Embarq )  
and Verizon for Billing Charges Unauthorized )  
by Telecommunications Consumer Protection )  
Act and Request for Refunds, by Citizens of )  
the State of Florida and Attorney General. )  
\_\_\_\_\_ )

Docket No: 060650-TL

Filed: January 10, 2007

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), 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 December 20, 2006, BellSouth filed its Responses to Florida Public Commission Staff's (hereinafter "Staff") First Set of Interrogatories and First Request for Production of Documents. BellSouth's Responses to Staff's Request for Production of Documents, Item Nos. 2 and 3 contain information that is proprietary to BellSouth.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in BellSouth's Response to Staff's First Request for Production of Documents contains customer specific proprietary information utilized by BellSouth to conduct its business. BellSouth's Responses also contain confidential business information of both BellSouth and third-parties as it relates to the terms and conditions associated with the provision of service by BellSouth as a billing agent to the third-party billing aggregators. A more specific

description of this information is contained in Attachment A. Public disclosure of this information would cause harm to BellSouth. Therefore, such information should be classified as confidential business information 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.

3. Attachment A to BellSouth'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 as confidential.

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

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

6. 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 10<sup>th</sup> day of January, 2007.

BELLSOUTH TELECOMMUNICATIONS, INC.

*James Meza III/RN*

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

*E. Earl Edenfield Jr./RN*

E. EARL EDENFIELD JR.  
J. PHILLIP CARVER  
Suite 4300, BellSouth Center  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0757

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No: 060650-TL  
Request for Confidential Classification  
Page 1 of 3  
12/20/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 2 AND 3, FILED DECEMBER 20, 2006 IN  
FLORIDA DOCKET NO. 060650-TL**

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Specifically, this information relates to customer specific proprietary information contained in customer complaints that is not publicly available, i.e. customer name, telephone number, etc. Disclosure of this data would impair the competitive business and cause harm to BellSouth. 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 confidential, proprietary contractual data between BellSouth and third-parties. Specifically, this information relates to Billing Processing Service Clearinghouse Operating Agreements entered into between BellSouth and third-party billing aggregators. These agreements are considered proprietary by the parties to such agreements. The disclosure of this information could impair BellSouth's ability to contract for goods or services on favorable terms. Accordingly the agreements are exempt from disclosure pursuant to Section 364.183 (3)(d).

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No: 060650-TL  
Request for Confidential Classification  
Page 2 of 3  
12/20/06

REQUEST FOR CONFIDENTIAL CLASSIFICATION TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 2 AND 3, FILED DECEMBER 20, 2006 IN  
FLORIDA DOCKET NO. 060650-TL

Production of Documents, Item No. 2

Location

Reason

Attachment A

All Pages - Customer Name, Account #, Address;  
Complainant Call Back Name & No.

1

Attachment B

Columns Labeled

Billing Tel No, Customer Name

Production of Documents, Item No. 3

Attachment A

All pages with the exception of  
Operating Agreements cover sheets &  
Master Tables of Contents;  
Umbrella Agreements cover sheet;  
Principal Operating Agreements  
cover sheets & Tables of Contents;  
Exhibits A-D cover sheets & Contents;  
Attachments 1-3 cover sheets;  
all of Appendix 1;  
Appendix 2 cover sheet

2



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No: 060650-TL  
Request for Confidential Classification  
Page 3 of 3  
12/20/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 2 AND 3, FILED DECEMBER 20, 2006 IN  
FLORIDA DOCKET NO. 060650-TL**

**Production of Documents, Item No. 3**

Location

Reason

Attachment B

All pages **with the exception of**  
Operating Agreements cover sheets &  
Master Tables of Contents;  
Umbrella Agreements cover sheet;  
Principal Operating Agreements  
cover sheets & Tables of Contents;  
Exhibits A-D cover sheets & Contents;  
Attachments 1-3 cover sheets;  
all of Appendix 1;  
Appendix 2 cover sheet

2

Attachment C

All pages **with the exception of**  
Operating Agreements cover sheets &  
Master Tables of Contents;  
Umbrella Agreements cover sheets;  
Principal Operating Agreements  
cover sheets & Tables of Contents;  
Exhibits A-D cover sheets & Contents;  
Attachments 1-3 cover sheets;  
all of Appendix 1;  
Appendix 2 cover sheet

2

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No: 060650-TL  
Request for Confidential Classification  
Page 1 of 1  
12/20/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 2 AND 3, FILED DECEMBER 20, 2006 IN  
FLORIDA DOCKET NO. 060650-TL**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No: 060650-TL  
Request for Confidential Classification  
Page 1 of 1  
12/20/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION TO  
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,  
ITEM NOS. 2 AND 3, FILED DECEMBER 20, 2006 IN  
FLORIDA DOCKET NO. 060650-TL**

**ONE HIGHLIGHTED COPY**