Legal Department

Manuel A. Gurdian Attorney

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

December 1, 2006

ORIGINAL

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

## Re: <u>Docket No. 060598-TL</u>: 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 Late-Filed Deposition Exhibits Nos. 3, 4, 6 and 8 for Kathy K. Blake, 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.

CMP /	Sincerely,
COM	Manuel A. Burdian /RN Manuel A. Gurdian
CTR	Manuel A. Gurdian 7787
ECR cc:	Jerry D. Hendrix
GCL	E. Earl Edenfield, Jr. James Meza III
OPC	James Meza m
RCA	
SCR	<b>DCCCCCCCCCCCCC</b>
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SEC _/	(Y) DC
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records	<i>"</i>

DOCUMENT NUMBER-DATE

#### 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 ateitzma@psc.state.fl.us fbanks@psc.state.fl.us Itan@psc.state.fl.us

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 <u>vkaufman@moylelaw.com</u> Represents NuVox Represents CompSouth 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

# ORIGINAL

#### FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition to recover 2005 tropical system related costs and expenses, by BellSouth Telecommunications, Inc. Docket No. 060598-TL

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 December 1, 2006, BellSouth filed the Late Filed Deposition Exhibits Nos. 1-8, of Kathy K. Blake. In particular, the Late Filed Deposition Exhibits Nos. 3, 4, 6 and 8 contain information that has been designated "confidential" and is proprietary to BellSouth.

2. 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.

3. 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.

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.

DOCUMENT NUMBER-DATE

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

BELLSOUTH TELECOMMUNICATIONS, INC.

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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

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#### 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 LATE FILED DEPOSITION EXHIBITS OF KATHY K. BLAKE, NOS. 3, 4, 6 AND 8, FILED DECEMBER 1, 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.
- 2. 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 shows the utilization of retail Hicap Systems broken down to wire center levels. If this information were disclosed publicly, it would severely damage the competitive interests of BellSouth.

# 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 LATE FILED DEPOSITION EXHIBITS OF KATHY K. BLAKE, NOS. 3, 4, 6 AND 8, FILED DECEMBER 1, 2006

LATE FILED DEPO EXHIBIT NO. 3 AND 4	Reason
Page 1-3, Jun-06 Column Page 1-17, Service Category Qty Column Page 1-17, Class of Service Qty Column	1 1 1
LATE FILED DEPO EXHIBIT NO. 6	Reason
Page 1, lines 2-5 and 7-10 Page 2, June 2006 Units Column Page 2, Revised Units Column Page 3-6, SUM(INSERV) Column Page 3-6, Revised (cut in half) Column	1 1 1 1
LATE FILED DEPO EXHIBIT NO. 8	Reason
Page 1-3, Florida WC CLLI Column Page 1-3, WC Name Column	2 2

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## ATTACHMENT B

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

# **REQUEST FOR CONFIDENTIAL CLASSIFICATION OF LATE FILED DEPOSITION EXHIBITS OF KATHY K. BLAKE, NOS. 3, 4, 6 AND 8, FILED DECEMBER 1, 2006**

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# 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 LATE FILED DEPOSITION EXHIBITS OF KATHY K. BLAKE, NOS. 3, 4, 6 AND 8, FILED DECEMBER 1, 2006**

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**ONE HIGHLIGHTED COPY**