

JAMES MEZA III  
Senior Regulatory Counsel

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0769

ORIGINAL

February 21, 2005

RECEIVED-FPSC  
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COMMISSION  
CLERK

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

**Re: 041114-TP – Complaint of XO Florida, Inc. Against  
BellSouth Telecommunications, Inc. for Refusal to Convert  
Circuits to UNEs and for Expedited Processing**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for Supplemental Responses to XO, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

*James Meza III RW*  
James Meza III

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Enclosures

cc: All Parties of Record  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

This confidentiality request was filed by or for a "telco" for DN 01779-05 No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAG.  
(X-ref. 01109-05)

RECEIVED & FILED

*Meza*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

*Request*  
01778 FEB 21 05

FPSC-COMMISSION CLERK

*Confidential*  
DOCUMENT NUMBER-DATE  
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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 041114-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 21st day of February, 2005 to the following:

Jason Rojas  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Tel. No. (850) 413-6179  
[irojas@psc.state.fl.us](mailto:irojas@psc.state.fl.us)

Vicki Gordon Kaufman (+)  
McWhirter Reeves  
Davidson Kaufman & Arnold, P.A.  
117 South Gadsden Street  
Tallahassee, FL 32301  
Tel. No. (850) 222-2525  
Fax. No. (850) 222-5606  
[vkaufman@mac-law.com](mailto:vkaufman@mac-law.com)  
Represents XO

Dana Shaffer  
XO Florida, Inc.  
VP, Regulatory Counsel  
105 Molloy Street, Ste. 300  
Nashville, TN 37201  
Tel. No. (615) 777-7700  
Fax. No. (615) 850-0343  
[dana.shaffer@xo.com](mailto:dana.shaffer@xo.com)

  
James Meza III

**(+) SIGNED PROTECTIVE AGREEMENT**

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Complaint of XO Florida, Inc.	)	
Against BellSouth Telecommunications,	)	Docket No. 041114-TP
Inc. for Refusal to Convert Circuits to	)	
UNEs and for Expedited Processing	)	Filed: February 21, 2005
_____	)	

**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 January 31, 2005, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Commission Order No. PSC-05-0096-PCO-TP, filed its Supplemental Responses to XO Florida Inc. ("XO")'s First Set of Interrogatories (Nos. 3 and 8) and First Request for Production of Documents (No. 2), dated November 22, 2004.

2. In order for Staff to take possession of BellSouth's responses to XO, on January 31, 2005, BellSouth filed a Notice of Intent, in particular, the documents provided in BellSouth's Supplemental Response to XO's First Request for Production, Item No. 2, which contains confidential business, proprietary information. A more specific description of this information is provided in Attachment A. These items 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. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the documents containing the confidential information.

4. Attachment C to BellSouth's Request for Confidential Classification is a proprietary highlighted copy of the confidential information.

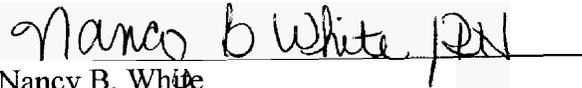
5. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.

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 21<sup>st</sup> day of February 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in black ink, written over a horizontal line.

Nancy B. White  
c/o Nancy Sims  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301  
(305) 347-5558

Handwritten signature of R. Douglas Lackey in black ink, written over a horizontal line.

R. Douglas Lackey  
James Meza III  
BellSouth Center – Suite 4300  
675 West Peachtree Street, N.E.  
Atlanta, Georgia 30375  
(404) 335-0769

#572843

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 1 of 3  
2/21/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO XO'S FIRST REQUEST FOR PRODUCTION, NO.  
2, FILED JANUARY 31, 2005, IN FLORIDA DOCKET NO. 041114-TP**

**Explanation of Proprietary Information**

1. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, BellSouth's internal procedures for the Circuit Provisioning Group (CPG) Job Aid provides descriptions, service restrictions, appropriate forms, service order issuance requirements, installation intervals, repair procedures, etc. that are proprietary and confidential to BellSouth as it describes BellSouth's internal operations.

Furthermore, this information has been prepared at great cost to BellSouth and therefore, others should not be permitted to gain the noncompetitive benefit from not having to develop these instructions and materials themselves. And, job aids have historically been protected by the Florida Public Service Commission. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

ATTACHMENT A

BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 2 of 3  
2/21/05

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO XO'S FIRST REQUEST FOR PRODUCTION, NO.  
2, FILED JANUARY 31, 2005, IN FLORIDA DOCKET NO. 041114-TP

Location

Reason

**POD NO. 2**

XO1stSUPPPODNO200002, lines 2-33	1
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XO1stSUPPPODNO200004, lines 2-14	1
XO1stSUPPPODNO200005, lines 2-23	1
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XO1stSUPPPODNO200007, lines 2-7	1
XO1stSUPPPODNO200008, lines 2-28	1
XO1stSUPPPODNO200009, lines 2-7	1
XO1stSUPPPODNO200010, lines 2-12	1
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XO1stSUPPPODNO200012, lines 2-41	1
XO1stSUPPPODNO200013, lines 2-43	1
XO1stSUPPPODNO200014, lines 2-44	1
XO1stSUPPPODNO200015, lines 2-37	1
XO1stSUPPPODNO200016, lines 2-57	1
XO1stSUPPPODNO200017, lines 2-14	1

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 3 of 3  
2/21/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO XO'S FIRST REQUEST FOR PRODUCTION, NO.  
2, FILED JANUARY 31, 2005, IN FLORIDA DOCKET NO. 041114-TP**

**Document II (cont)**

XO1stSUPPPODNO200018, lines 2-55	1
XO1stSUPPPODNO200019, lines 2-14	1
XO1stSUPPPODNO200020, lines 2-49	1
XO1stSUPPPODNO200021, lines 2-47	1
XO1stSUPPPODNO200022, lines 2-28	1
XO1stSUPPPODNO200023, lines 2-54	1
XO1stSUPPPODNO200024, lines 2-62	1
XO1stSUPPPODNO200025, lines 2-32	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 1 of 1  
2/21/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO XO'S FIRST REQUEST FOR PRODUCTION, NO.  
2, FILED JANUARY 31, 2005, IN FLORIDA DOCKET NO. 041114-TP**

**2 COPIES OF PUBLIC DISCLOSURE DOCUMENT**

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO Florida's 1<sup>st</sup> Request for Production  
November 22, 2004  
SUPPLEMENTAL Item No. 2

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OUTSIDE THE BELL SOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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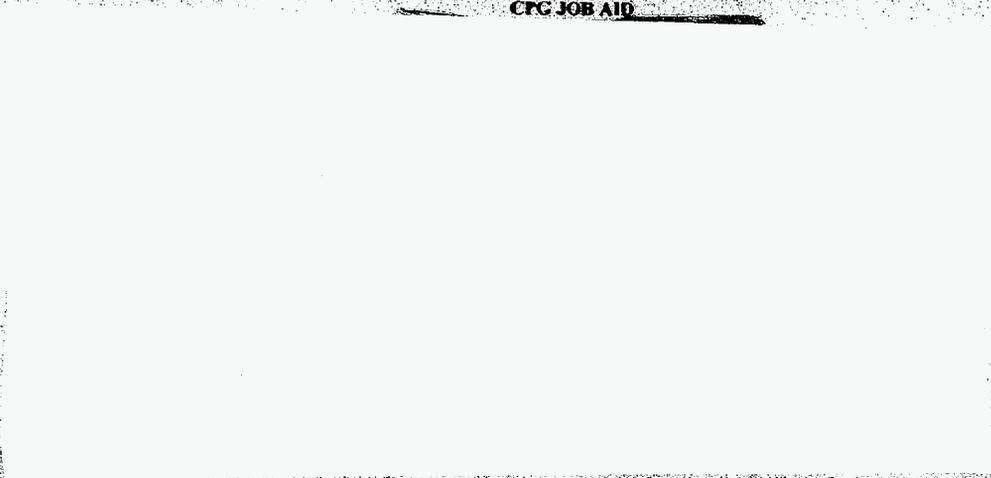
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CONTAINS PRIVATE AND/OR PROPRIETARY INFORMATION. MAY NOT BE USED OR DISCLOSED  
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OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 041114-TP  
XO Florida's 1<sup>st</sup> Request for Production  
November 22, 2004  
SUPPLEMENTAL Item No. 2

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OUTSIDE THE BELL SOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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CPC JOB AID

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OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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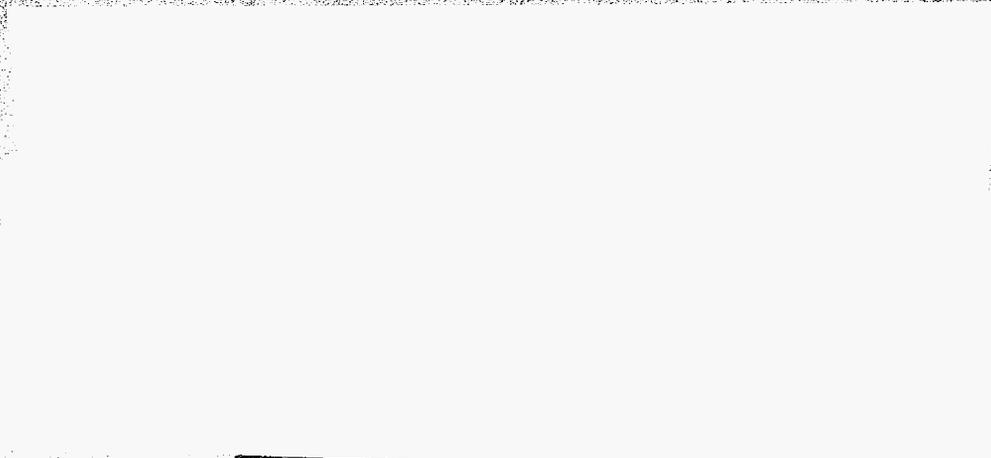
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PRIVATE/PROPRIETARY  
CONTAINS PRIVATE AND/OR PROPRIETARY INFORMATION. MAY NOT BE USED OR DISCLOSED  
OUTSIDE THE BELL SOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

CONTAINS PRIVATE AND/OR PROPRIETARY INFORMATION - MAY NOT BE USED OR DISCLOSED  
OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

PRIVATE/PROPRIETARY



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OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

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Handwritten signature or mark

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OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT.

Handwritten notes on the left margin, including a checkmark and a vertical list of numbers: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50.

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Handwritten list of numbers: 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100

Handwritten notes on the left margin, including a vertical line of text and a signature.

Handwritten numbers '22' and '23' on the left margin.



Handwritten notes on the right side of the page, including a large arrow pointing upwards and a vertical list of numbers and symbols.

PRIVATE/PROPRIETARY  
CONTAINS PRIVATE AND/OR PROPRIETARY INFORMATION, MAY NOT BE USED OR DISCLOSED  
OUTSIDE THE BELLSOUTH COMPANIES EXCEPT PURSUANT TO A WRITTEN AGREEMENT

Handwritten notes on the left margin, including a vertical list of numbers: 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31.

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**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 041114-TP  
Request for Confidential Classification  
Page 1 of 1  
2/21/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
SUPPLEMENTAL RESPONSE TO XO'S FIRST REQUEST FOR PRODUCTION, NO.  
2, FILED JANUARY 31, 2005, IN FLORIDA DOCKET NO. 041114-TP**

**PROPRIETARY COPY**