NANCY B. WHITE General Counsel - Florida

BellSouth Telecommunications, Inc. 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5558

September 17, 2001

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

> Docket No. 010740-TP (IDS Complaint) Re:

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for IDS Long Distance, Inc. n/k/a IDS Telecom, L.L.C.'s Second Supplemental Responses to BellSouth's Interrogatory No. 102, 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.

Mancy B. White

Nancy B. White

LEA 1

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

> DOCUMENT NUMBER-DATE 11559 SEP 17 a

### CERTIFICATE OF SERVICE Docket No. 010740-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via by (\*) Hand Delivery and Federal Express this 17th day of September, 2001 to the following:

Mary Anne Helton (\*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Te. No. (850) 413-6096
mhelton@psc.state.fl.us

Suzanne Fannon Summerlin (+) (\*) 1311-B Paul Russell Road Suite 201
Tallahassee, Florida 32301
Tel. No. (850) 656-2288
Fax No. (850) 656-5589
summerlin@nettally.com
Represents IDS

Michael Noshay, President IDS Long Distance, Inc. n/k/a IDS Telcom, LLC 1525 N.W. 167th Street Second Floor Miami, Florida 33169 Tel. No. (305) 913-4000 Fax No. (305) 913-4039 mnoshay@idstelcom.com

Nancy B. White (KA)

(+) Signed Protective Agreement

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of IDS Long Distance, Inc.	)	Docket No.: 010740-TP
n/k/a IDS Telecom, L.L.C., Against	)	
BellSouth Telecommunications, Inc., and	í	
Request for Emergency Relief	í	
	ý	Filed: September 17, 2001

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

BellSouth Telecommunications, Inc. ("BellSouth" or "Company"), hereby files, pursuant to Rule 25-22.006, Florida Administrative Code, its Request For Confidential Classification, and states the following:

- 1. On August 27, 2001, BellSouth received IDS Long Distance, Inc.

  n/k/a IDS Telecom, L.L.C.'s ("IDS") Second Supplemental Responses to

  BellSouth's Interrogatories. IDS' response to BellSouth's Interrogatory No. 102

  contains information that is considered confidential and proprietary to BellSouth.
- 2. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification for the subject information because the information contained in IDS' response to BellSouth's Interrogatory No. 102 contains customer-specific information that is considered confidential and proprietary to BellSouth. Additionally, this information is valuable and BellSouth strives to keep it secret. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential business information. A more specific description of this information is contained in Attachment A. Accordingly, it

should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

- 3. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.
- 4. Appended hereto as Attachment B is two copies of the requested documents with the confidential information deleted.
- Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

WHEREFORE, based on the foregoing, BellSouth moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 17th day of September, 2001.

BELLSOUTH TELECOMMUNICATIONS, INC.

(KA)

NANCY B. WHITE

JAMES MEZA III

c/o Nancy Sims

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#### **ATTACHMENT A**

BellSouth Telecommunications, Inc. FPSC Docket No. 010740-TP Request for Confidential Classification Page 1 9/17/01

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF IDS's 2<sup>nd</sup> SUPPLEMENTAL ANSWERS TO BELLSOUTHS' INTERROGATORIES, ITEM NO. 102 AS FILED ON AUGUST 27, 2001 IN FLORIDA PUBLIC SERVICE COMMISSION DOCKET 010740-TP

#### **Explanation of Proprietary Information**

1. This information is proprietary to BellSouth and includes information containing proprietary information. The Commission has always zealously protected business proprietary information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. This information is clearly confidential and proprietary under Florida Statutes, Section 364.24, Section 364.183 and Rule 25-22.006, Florida Administrative Code.

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Entire Document 1