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

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

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for the Rebuttal Panel Testimony of Petra Pryor and Michael Lepkowski, 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,

Mancy B. White Nancy B. White

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

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
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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

(+) 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)	
Request for Emergency Relief)	
)	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 filed its Rebuttal Testimony of Sandra Harris, the Rebuttal Testimony of Beth Shiroishi, the Rebuttal Testimony of Mary K. Batcher, the Rebuttal Panel Testimony of John Ruscilli and Elizabeth Rokholm and Shelly Walls, the Rebuttal Panel Testimony of Ken Ainsworth, Linda Tate and Claude Morton, the Rebuttal Panel Testimony of Janet Miller Fields and Robby Pannell, the Rebuttal Panel Testimony of Jerry Wilson, Jimmy Patrick, Pattie Knight and Pat Rand, and the Rebuttal Panel Testimony of Petra Pryor and Michael Lepkowski. A Notice of Intent to Request Confidential Classification was filed on this same day for the Rebuttal Testimony of Mary K. Batcher and the Rebuttal Panel Testimony of Petra Pryor and Michael Lepkowski. On August 30, 2001, by letter BellSouth withdrew the Notice of Intent for Mary K. Batcher. However, the Rebuttal Panel Testimony of Petra Pryor and

Michael Lepkowski contain 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 the Rebuttal Panel Testimony of Petra Pryor and Michael Lepkowski contain 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.
- 5. 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.

NANCY BOWHITE (31)
JAMES MEZA III

c/o Nancy Sims

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411004

ATTACHMENT A

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

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REBUTTAL PANEL TESTIMONY OF PETRA PRYOR AND MICHAEL LEPKOWSKI 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 customer specific proprietary information. The Commission has always zealously protected customer proprietary and 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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