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May 1, 2003

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.: 020919-TP  
Complaint of AT&T Communications of the Southern States, LLC,  
Teleport Communications Group, Inc., and TCG South Florida for  
Enforcement of Interconnection  
Agreements with BellSouth Telecommunications, Inc.**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Confidential Classification for its Responses to AT&T's First Request for Production of Documents, Item Nos. 2 and 4, 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,

*Andrew D. Shore*

Andrew D. Shore (AS)

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

DOCUMENT NUMBER DATE

04000 MAY-1 8

FPSC-COMMISSION CLERK

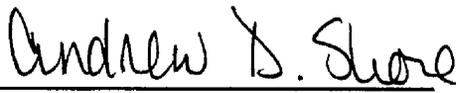
**CERTIFICATE OF SERVICE  
DOCKET NO. 020919-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Hand Delivery (\*), electronic mail and First Class U.S. Mail this 1st day of May 2003 to the following:

Patricia Christensen (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
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\_\_\_\_\_  
Andrew D. Shore (CA)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for arbitration )  
concerning complaint of AT&T ) Docket No. 020919-TP  
Communications of the Southern )  
States, LLC, Teleport )  
Communications Group, Inc., and )  
TCG South Florida for )  
enforcement of interconnection )  
agreements with BellSouth )  
Telecommunications, Inc. )  
\_\_\_\_\_ ) Filed: May 1, 2003

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), files, pursuant to Rule 25-22.006, Florida Administrative Code, this Request For Specified Confidential Classification and states the following:

1. On April 10, 2003, BellSouth Telecommunications, Inc. filed its Responses to AT&T's First Request for Production of Document Item Nos. 2 and 4. In addition, BellSouth filed a Notice of Intent to Request Specified Confidential Classification with respect to the documents responsive to Production of Document Item Nos. 2 and 4. Pursuant to Rule 25-22.06(3)(a), BellSouth is now filing a Request for Confidential Classification of these documents because said documents contain competitive business information that is considered confidential and proprietary to BellSouth. A more specific description of this information is contained in Attachment A.

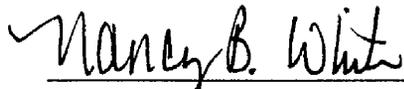
2. BellSouth has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

3. Appended hereto as Attachment B are two copies of the requested documents with the confidential information deleted.

4. Appended hereto as Attachment C is a proprietary copy of the confidential information.

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 1st day of May 2003.

  
\_\_\_\_\_  
NANCY B. WHITE (KA)  
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c/o Nancy H. Sims  
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\_\_\_\_\_  
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COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE  
TO AT&T'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS ITEM NOS. 2  
AND 14 FILED ON APRIL 10, 2003, IN DOCKET 020919-TP.**

**Explanation of Proprietary Information**

1. The information requested concerns competitive business information. This information if released would be unfair to BellSouth for it would allow the competition to have free access to information on BellSouth's internal processes. This same information on competitors is not available to BellSouth. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

**PRODUCTION OF DOCUMENTS**  
**ITEM NOS. 2 AND 14**

**LOCATION**

**REASON**

Entire Document

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