

ORIGINAL

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Legal Department

Meredith Mays  
Senior Regulatory Counsel

03 DEC 31 AM 10: 27

BellSouth Telecommunications, Inc.  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(404) 335-0750

December 30, 2003

VIA OVERNIGHT MAIL

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

RECEIVED-FPSC  
03 DEC 31 AM 10: 36  
COMMISSION  
CLERK

Re: Docket No. 030851-TP

Dear Ms. Bayó:

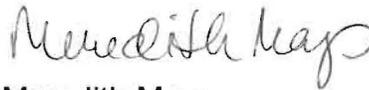
Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification for its Supplemental Responses to AT&T's Subpoena Duces Tecum without Deposition and Response to MCI's Subpoena Duces Tecum without Deposition, which we ask that you file in the above referenced 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 of this letter have been served upon AT&T and MCI, the parties that served the Subpoenas Duces Tecum without deposition upon BellSouth.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Sincerely,



Meredith Mays

cc: Counsel for AT&T and MCI  
Marshall M. Criser III  
R. Douglas Lackey  
Nancy B. White

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
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comp  
records

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 13592-03. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE

13591 DEC 31 03

FPSC-COMMISSION CLERK

# ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising )  
from Federal Communications Commission ) Docket No. 030851-TP  
triennial UNE review: Local Circuit Switching )  
for Mass Market Customers. ) Filed December 30, 2003  
)

### **BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. ("BellSouth"), and pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent to Request Specified Confidential Classification.

1. On December 30, 2003, BellSouth Telecommunications, Inc. filed in the above captioned proceeding its Supplemental Response to AT&T Communications of the Southern States, LLC's Subpoena Duces Tecum Without Deposition and Response to MCI's Subpoena Duces Tecum Without Deposition. Included with its response was a CD and attachments containing confidential third party information that is considered proprietary and that is protected by the FCC's Customer Proprietary Network Information rules.

2. Because the CD and attachments responsive to AT&T and MCI's subpoenas contain proprietary information and information that is protected by the FCC's Customer Proprietary Network Information rules, BellSouth is now filing this Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of this material without delay. The original of

DOCUMENT NUMBER-DATE

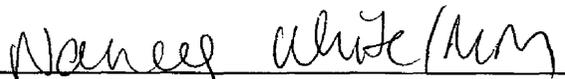
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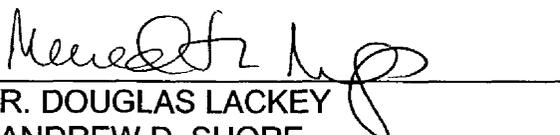
FPSC-COMMISSION CLERK

this notice has been filed with the Division of Records and Reporting, and a copy has been served on AT&T and MCI, the parties that served the subpoenas upon BellSouth. BellSouth will be filing a Request for Confidential Classification within 21 days of the filing of this Notice of Intent.

Respectfully submitted this 30th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

  
R. DOUGLAS LACKEY  
ANDREW D. SHORE  
MEREDITH E. MAYS  
Suite 4300  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0750

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Docket No. 030851-TP )  
Implementation of requirements arising )  
from Federal Communications Commission ) Docket No. 030851-TP  
triennial UNE review: Local Circuit Switching )  
for Mass Market Customers. ) Filed: December 30, 2003  
\_\_\_\_\_ )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
SUPPLEMENTAL RESPONSE TO  
AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S  
SUBPOENA DUCES TECUM WITHOUT DEPOSITION  
AND RESPONSE TO  
MCI'S SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

BellSouth Telecommunications, Inc. ("BellSouth") hereby provides the following Supplemental Responses to AT&T of the Southern States, LLC's ("AT&T") Subpoena Duces Tecum Without Deposition and hereby provides its response to MCI's Subpoena Duces Tecum Without Deposition.

**SPECIFIC RESPONSES**

**REQUEST:** Refer to the Direct Testimony of Pamela A. Tipton at page 10, lines 9-17, please indicate the number of “ported” residential telephone numbers to each CLEC, in each market listed in Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms Tipton relied on for her testimony.

**RESPONSE:** Copies of the responsive documents are being provided on the enclosed CD. The responsive documents contain confidential information that is protected under the FCC’s Customer Proprietary Network Information (“CPNI”) rules, 47 CFR §64.2007 and are being provided pursuant to the terms of the parties’ Protective Agreement and in response to AT&T’s Subpoena Duces Tecum Without Deposition.

**SUPPLEMENTAL**

**RESPONSE:** Copies of the responsive documents were provided to AT&T via CD on December 26, 2003. BellSouth is providing a copy of this CD to MCI in response to MCI’s Subpoena Duces Tecum Without Deposition and is also filing a copy of the CD with the Commission pursuant to Order No. PSC-03-1054-PCO-TP and Order No. PSC-03-1263-PCO-TP (“Protective Order”). The CD contains confidential information as set forth in the response above.

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 030851-TP  
AT&T/MCI Subpoena Duces Tecum Without Deposition  
December 18, 2003  
Item No. 2  
Page 1 of 1

**REQUEST:** Refer to the Direct Testimony of Pamela A. Tipton at page 11, lines 9-21, please indicate the number of "extracted" business class loops to each CLEC, in each market listed in Exhibit PAT-5. Please provide this information, if available, by month and by CLEC over the past 24 months or whatever time period Ms Tipton relied on for her testimony.

**RESPONSE:** Copies of the responsive documents are being provided on the enclosed CD. BellSouth also directs AT&T to the documents responsive to Item No. 1. The responsive documents contain confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 and are being provided pursuant to the terms of the parties' Protective Agreement and in response to AT&T's Subpoena Duces Tecum Without Deposition.

**SUPPLEMENTAL**

**RESPONSE:** Copies of the responsive documents were provided to AT&T via CD on December 26, 2003. BellSouth is providing a copy of this CD to MCI in response to MCI's Subpoena Duces Tecum Without Deposition and is filing a copy of the CD with the Commission pursuant to Order No. PSC-03-1054-PCO-TP and the Protective Order. The CD contains confidential information as set forth in the response above.

**REQUEST:** Refer to the Direct Testimony of Pamela A. Tipton at page 11, lines 9-21, please provide for the last eighteen months, by month, by market, by wire center within the market, and by CLEC the number of:

- a. 2-Wire UNE loops;
- b. 4- Wire UNE loops;
- c. DS1 UNE loops;
- d. DS3 UNE loops;
- e. DS0 EELs;
- f. DS1 EELs;
- g. DS3 EELs;
- h. T-1 Special Access lines; and
- i. DS3/T-3 Special Access lines

provisioned to the CLECs listed in Exhibit PAT-5.

**RESPONSE:** Information responsive to this request will be provided on December 30, 2003 in BellSouth's Response to AT&T's Third Set of Interrogatories, Item No. 125, in this docket.

**SUPPLEMENTAL**

**RESPONSE:** Information responsive to this request is attached. The responsive information contains confidential information that is protected under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007. This information is being provided pursuant to the terms of the parties' Protective Agreement, the Protective Order, and in response to the Subpoena Duces Tecum Without Deposition served upon BellSouth by AT&T and MCI. The attached information is also responsive to AT&T's Third Set of Interrogatories, Item No. 125, in this docket.

- REQUEST:** Refer to the Direct Testimony of Pamela A. Tipton at page 16, lines 20, through page 17, line 6, and Exhibits PAT-6 and PAT-7. Please provide all information “related to the actual deployment that exists in 7 of the 10 markets.” Including at a minimum:
- a. The identify each of the switches claimed to be providing service to mass market customers, by owner, location and CLLI code;
  - b. The number of mass market customers claimed to be served from each switch;
  - c. The number of “ported” residential telephone numbers to each CLEC, in each market listed. Please provide this information, if available, by month, and by CLEC over the past 24 months.
  - d. The number of “extracted” business class loop to each CLEC, in each market listed. Please provide this information, if available, by month and by CLEC over the past 24 months.
  - e. For the last eighteen months, by month, by market, by wire center within the market, and by LCEC the number of:
    - i. 2W UNE loops;
    - ii. 4W UNE loops;
    - iii. DS1 UNE loops;
    - iv. DS3 UNE loops;
    - v. DS0 EELs;
    - vi. DS1 EELs;
    - vii. DS3 EELs;
    - viii. T-1 Special Access lines;
    - ix. DS3/T-3 Special Access lines;

provisioned to the CLECs listed in Exhibit PAT-7.

**RESPONSE:** Information responsive to this request will be provided on December 30, 2003 in BellSouth’s Response to AT&T’s Third Set of Interrogatories, Item No. 126, in this docket.

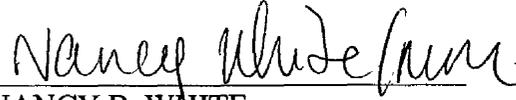
BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 030851-TP  
AT&T/MCI Subpoena Duces Tecum Without Deposition  
December 18, 2003  
Item No. 4  
Page 2 of 2

**SUPPLEMENTAL**

**RESPONSE:** BellSouth directs AT&T and MCI to the information provided in its Supplemental Response to Item No. 3 above. The information provided is also responsive to AT&T's Third Set of Interrogatories, Item No. 126, in this docket.

Respectfully submitted this 30<sup>th</sup> day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.



NANCY B. WHITE

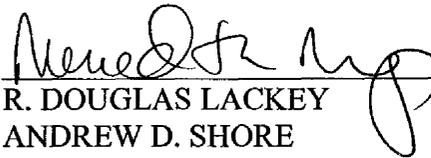
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