

ORIGINAL

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COMMISSION
CLERK

January 26, 2004

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: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications Inc.'s Request for Specified Confidential Classification for its Responses to MCI's Second Request for Production of Documents, No. 2, 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 have been served to the parties shown on the attached Certificate of Service.

RECEIVED & FILED

Sincerely,

[Signature]
FPSC-BUREAU OF RECORDS

Nancy B White / RB
Nancy B. White

Enclosure

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

523850

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH
1 conf records

This confidentiality request was filed by or for a "telco" for DN 001143-04. 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), FAC

(X-ref. 00101-04)

DOCUMENT NUMBER-DATE

01142 JAN 26 04

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 030851-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, Hand Delivery* and FedEx® this 26th day of January 2004 to the following:

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Nancy B. White

(+)signed Protective Agreement
(*) via Hand Delivery
(⊗) via FedEx

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: January 26, 2004
_____)

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

COMES NOW, BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On January 5, 2004, BellSouth filed its responses to MCI's Second Set of Interrogatories (Nos. 196-221) and Second Request for Production (No. 2), dated December 16, 2003.

In addition, BellSouth filed a Notice of Intent with respect to BellSouth's Response to MCI's Second Request for Production, No. 2, a document responsive to Interrogatory No. 208.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained in the document provided in BellSouth's Response to MCI's Second Request for Production, No. 2 includes confidential business information utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to BellSouth and provide competitors with an unfair advantage. The information discussed in the Request for Specified Confidential Classification is valuable and BellSouth strives to keep it secret. Therefore, such information should be classified as

confidential business information and customer proprietary information pursuant to Section 364.24 and Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

3. Attachment A to BellSouth's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by BellSouth as confidential.

4. Attachment B to BellSouth's Request for Confidential Classification is redacted copies of the document containing the confidential information.

5. Attachment C to BellSouth's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

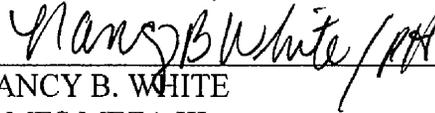
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this information as confidential in all requests, and this information has not been generally disclosed.

7. 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 26th day of January, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



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ATTACHMENT A

**BellSouth Telecommunications, Inc.
FPSC Docket No. 030851-TP
Request for Confidential Classification
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1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO MCI'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,
IN FLORIDA DOCKET NO. 030851-TP**

Explanation of Proprietary Information

1. The subject information contains confidential business information related to competitive interests of BellSouth. Specifically, this information contains work force projections. Disclosure of this data would impair the competitive business of, and cause harm to, BellSouth. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida.

ATTACHMENT A

**BellSouth Telecommunications, Inc.
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1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO MCI'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,
IN FLORIDA DOCKET NO. 030851-TP**

POD NO. 2, (Document responsive to Interrogatory No. 208)

<u>Location</u>	<u>Page Numbers</u>	<u>Reason</u>
Entire Document		1

ATTACHMENT B

**BellSouth Telecommunications, Inc.
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1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO MCP'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,
IN FLORIDA DOCKET NO. 030851-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

Entire Document Redacted

ATTACHMENT B

**BellSouth Telecommunications, Inc.
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1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO MCI'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,
IN FLORIDA DOCKET NO. 030851-TP**

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ATTACHMENT C

**BellSouth Telecommunications, Inc.
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1/26/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S RESPONSE
TO MCP'S SECOND REQUEST FOR PRODUCTION (NO. 2) FILED JANUARY 5, 2004,
IN FLORIDA DOCKET NO. 030851-TP**

ONE HIGHLIGHTED COPY