

ORIGINAL

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Legal Department

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COMMISSION  
CLERK

Nancy B. White  
General Counsel - FL

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

September 2, 2004

Mrs. Blanco S. Bayo  
Director, Division of the Commission Clerk  
And Administrative Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: **Undocketed Matter**  
2004 Incumbent Local Exchange Carrier (ILEC) Data Request

Dear Ms. Bayo,

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification for BellSouth's Fourth Supplemental responses to Staff's data request dated June 3, 2004 for Item No. 1. This response contains confidential information. Please file this request in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return a copy to me.

This request for confidentiality was filed by or on behalf of a telecommunications company for undocketed Confidential Document No. 09657-04. No ruling is required unless the material is subject to a request per 119.07, FS. Your division director must obtain written permission from the EXD/Tech for you to access the confidential material. (See DNS. 07704-04, 0785304, 07913-04, 08608-04, 08917-04, 09100-04, 09657-04)

Sincerely,

*Nancy B. White*  
Nancy B. White

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL 1 \_\_\_\_\_

OPC \_\_\_\_\_

MMS 1 Enclosures

RCA \_\_\_\_\_ Cc: All Parties of Record

SCR \_\_\_\_\_ Marshall M. Criser III

SEC 1 \_\_\_\_\_ R. Douglas Lackey

OTH 1 *conf records*

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

**09656** SEP -2 3

FPSC-COMMISSION CLERK

**2004 Incumbent Local Exchange Carrier (ILEC) Data Request**  
**Third Supplemental Response**  
*(Fourth Supplement Due by September 2, 2004)*

**Company:** BellSouth Telecommunications, Inc.  
**Contact name & title:** Nancy H. Sims, Director  
**Telephone number:** 850 222-1201  
**E-mail address:** Nancy.Sims@bellsouth.com  
**Stock Symbol (if company is publicly traded):** BLS

1. Please complete the attached Tables 1-4.

RESPONSE: Completed Tables 2 and 3 are provided in the enclosed Proprietary CD-ROM. This response contains proprietary, confidential business information. BellSouth needs additional time to respond to Tables 1 and 4 and will supplement this request at a later date.

FIRST SUPPLEMENTAL RESPONSE: Completed Tables 1 and 4 are provided in the enclosed Proprietary CD-ROM. This response contains proprietary, confidential business information.

SECOND SUPPLEMENTAL RESPONSE: In response to the Florida Public Service Commission's ("Commission") request, Tables 1, 3 and 4 have been revised and are categorized as requested by and discussed with the Commission. The revised Tables are provided in the enclosed Proprietary CD-ROM. This response contains proprietary, confidential business information.

THIRD SUPPLEMENTAL RESPONSE: In response to the Florida Public Service Commission's ("Commission") August 12 request, Table 3 has been revised and is categorized as requested by the Commission. The revised Table is in the enclosed Proprietary CD-ROM. This response contains proprietary, confidential business information.

FOURTH SUPPLEMENTAL RESPONSE: In response to the Florida Public Service Commission's ("Commission") request, Table 4 has been revised and is categorized as requested by the Commission. The revised Table is in the enclosed Proprietary CD-ROM. This response contains proprietary, confidential business information.

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2004 Incumbent Local Exchange)  
Carrier (ILEC) Data Request )  
\_\_\_\_\_ )

Undocketed

Filed: September 2, 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 September 2, 2004, BellSouth filed its Fourth Supplemental Responses to the Florida Public Service Commission's ("Commission") Request related to the status of local competition in Florida. BellSouth's Fourth Supplemental Response to the Commission's Request, Item No. 1, produced on a proprietary CD-ROM, contains information that is proprietary to BellSouth.

2. Pursuant to Rule 25-22.06(3)(a), BellSouth hereby files this Request for Specified Confidential Classification because the information contained on the CD-ROM in BellSouth's Fourth Supplemental Response to the Commission's Request, Item No. 1, includes proprietary data relating to confidential information of competing local exchange carriers that is protected under the FCC's Customer Proprietary Network Information Rules and confidential business information utilized by BellSouth to conduct business. A more specific description of this information is contained in Attachment A. Public disclosure of such information would disadvantage BellSouth's customers and potentially harm their ability to compete in the telecommunications market. Additionally, the disclosure of this information would cause

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competitive harm to BellSouth and provide competitors with an unfair advantage. Therefore, such information should be classified as confidential, 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.

4. 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.

5. Attachment B to BellSouth's Request for Confidential Classification is two CD-ROMs which include redacted copies of the document containing the confidential information.

6. Attachment C to BellSouth's Request for Confidential Classification is the CD-ROM which includes a highlighted copy of the document containing the confidential information.

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 2<sup>nd</sup> day of September, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.

Handwritten signature of Nancy B. White in cursive, followed by a horizontal line.

NANCY B. WHITE

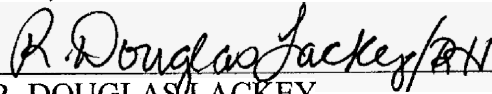
JAMES MEZA III

c/o Nancy Sims

150 South Monroe Street, Suite 400

Tallahassee, FL 32301

(305) 347-5558

Handwritten signature of R. Douglas Lackey in cursive, followed by a horizontal line.

R. DOUGLAS LACKEY

675 W. Peachtree St., NE

Atlanta, GA 30375

(404) 335-0747

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
**Page 1 of 5**  
**09/02/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S FOURTH SUPPLEMENTAL RESPONSE TO THE  
COMMISSION'S REQUEST, ITEM NO. 1, FILED ON SEPTEMBER 2, 2004**

**Explanation of Proprietary Information**

1. This information contains third-party business information related to the competitive interests of third-party companies that is proprietary. Specifically, the subject information is confidential, customer-specific proprietary information that is also protected under the FCC's Customer Proprietary Network information rules, 47 CFR §64.2007. Disclosure of this data would impair the competitive business and cause harm to the third-party companies. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
2. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Specifically, this information relates to percentages and line counts of residential and business customers and information consisting of the number of working lines detailed by wire center. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
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**09/02/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S FOURTH SUPPLEMENTAL RESPONSE TO THE  
COMMISSION'S REQUEST, ITEM NO. 1, FILED ON SEPTEMBER 2, 2004**

**REQUEST, ITEM NO. 1, TABLE 1 (excel spreadsheet)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
Total VGE Lines	2

**REQUEST, ITEM NO. 1, TABLE 2 (excel spreadsheet)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
CLEC Name	1
Total VGE Lines	1

**REQUEST, ITEM NO. 1, TABLE 3 (excel spreadsheet)**

<u>Location</u>	<u>Reason</u>
<u>Column Labeled</u>	
CLEC Name	1
Total Lines	1



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
**Page 3 of 5**  
**09/02/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S FOURTH SUPPLEMENTAL RESPONSE TO THE  
COMMISSION'S REQUEST, ITEM NO. 1, FILED ON SEPTEMBER 2, 2004**

**REQUEST, ITEM NO. 1, TABLE 4 (excel spreadsheet)**

Location

Reason

Column Labeled

Total Lines

2



**ATTACHMENT B**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
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**09/02/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S FOURTH SUPPLEMENTAL RESPONSE TO THE  
COMMISSION'S REQUEST, ITEM NO. 1, FILED ON SEPTEMBER 2, 2004**

**TWO REDACTED CD-ROMs FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.**  
**Undocketed**  
**Request for Confidential Classification**  
**Page 5 of 5**  
**09/02/04**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
BELLSOUTH'S FOURTH SUPPLEMENTAL RESPONSE TO THE  
COMMISSION'S REQUEST, ITEM NO. 1, FILED ON SEPTEMBER 2, 2004**

**ONE HIGHLIGHTED PROPRIETARY CD ROM**