Meredith E. Mays Senior Regulatory Counsel

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

November 20, 2003

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

> Docket No. 030869-TP: Petition by BellSouth Telecommunications, Inc. to Reduce Re: its Network Access Charges Applicable to Intrastate Long Distance in a Revenue-Neutral manner

Docket No. 030867-TP: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes

Docket No. 030868-TP: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes

Docket No. 030961-TP: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Notice of Intent to Request Confidential Classification and Motion for Temporary Protective Order for its Responses to Staff's Third Set of Interrogatories Item No. 56, the attachment to No. 57, Nos. 63, 64, 65, 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,

Meredith E. Mays (14)

Enclosure cc: All Parties of Record Marshall M. Criser III R. Douglas Lackey Nancy B. White 514242

DOCUMENT NUMPER- DATE 11782 1101 20 3 FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE Docket Nos. 030867-TP, 030868, 030869-TL and 030961-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and Federal Express this 20<sup>th</sup> day of November, 2003 to the following:

Beth Keating, Staff Counsel Felicia Banks, Staff Counsel Patricia Christensen, Staff Counsel Lee Fordham, Staff Counsel Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Phone: (850) 413-6212 Fax: (850) 413-6250 bkeating@psc.state.fl.us fbanks@psc.state.fl.us pchriste@psc.state.fl.us cfordham@psc.state.fl.us

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Verizon Florida, Inc. Ms. Michelle A. Robinson 106 East College Avenue, Suite 810 Tallahassee, FL 32301-7704 Tel. No. (813) 483-2526 Fax. No. (813) 223-4888 Michelle.Robinson@verizon.com

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Meredith Mays (144)

(+) Protective Agreement

(\*) Hand Delivered

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes	) Docket No. 030961-TP )
In re: Petition by Verizon Florida, Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes	) Docket No. 030867-TL ) )
In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes	) Docket No. 030868-TL ) )
In re: Petition by BellSouth Telecommunications, Inc., To Reduce Its Network Access Charges Applicable To Intrastate Long Distance in A	) Docket No. 030869-TL )
Revenue-Neutral Manner	) Filed November 20, 2003

## BELLSOUTH TELECOMMUNICATIONS, INC.'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION AND MOTION FOR TEMPORARY PROTECTIVE ORDER

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.006, Florida

Administrative Code, hereby files this Notice of Intent to Request Confidential Classification and

pursuant to rule 25-22.006(5)(c), Florida Administrative code, its Motion for Temporary Protective

Order.

1. On November 20, 2003, BellSouth served its Responses to Staff's Third Set of

Interrogatories Nos. 63-65 of which responsive Interrogatory No. 56, the attachment to

Interrogatory No. 57, Interrogatory Nos. 63, 64, 65 contains proprietary confidential business

information.

2. Because BellSouth's responsive Interrogatory No. 56, the attachment to

Interrogatory No. 57, Interrogatory Nos. 63, 64, 65 contains proprietary confidential business

information, BellSouth is filing this Notice of Intent to Request Specified Confidential Classification and Motion for Temporary Protective Order pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the documents without delay. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

## **MOTION FOR TEMPORARY PROTECTIVE ORDER**

BellSouth's responsive Interrogatory No. 56, the attachment to Interrogatory No. 57, Interrogatory Nos. 63, 64, 65 to Staff's Third Set of Interrogatories contain proprietary confidential business information that should not be disclosed. Pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth respectfully requests that the Pre-hearing Officer issue a Temporary Protective Order exempting these documents from § 119.07(1), Florida Statutes. The responsive Interrogatory No. 56, the attachment to Interrogatory No. 57, Interrogatory Nos. 63, 64, 65 contain, among other things, information relating to competitive interests, confidential financial information, and other proprietary confidential business information pursuant to § 364.183(3), Florida Statutes. If Counsel subsequently notifies BellSouth that any of the proprietary documents are to be used in a proceeding before the Commission, BellSouth will, in accordance with Rule 25-22.006, Florida Administrative Code, file a detailed Motion for Protective Order specifically addressing each of the documents identified. Respectfully submitted this 20<sup>th</sup> day of November, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.

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

DAKING R. DOUGLAS LACKEY

R. DOUGLAS LACKEY MEREDITH E. MAYS 675 West Peachtree Street, #4300 Atlanta, Georgia 30375 (404) 337-0750

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