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September 29, 2005

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. 000121A-TP**  
**In Re: Investigation into the establishment of operations support  
systems permanent incumbent local exchange Telecommunications  
companies**

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc.'s Request for Specified Confidential Classification, 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. A copy of the same is being provided to all parties of record.

Sincerely,



Robert A. Culpepper

Enclosures

cc: All parties of record  
Jerry D. Hendrix  
Nancy B. White  
R. Douglas Lackey

DOCUMENT NUMBER-DATE

09279 SEP 29 05

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**CERTIFICATE OF SERVICE**  
**Docket No. 000121A-TP**

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

Electronic Mail and U.S. Mail this 29th day of September, 2005 to the following:

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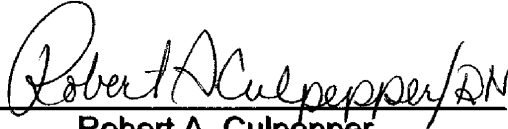
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Robert A. Culpepper

**(+) Signed Protective  
Agreement**

#502166

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the ) Docket No. 000121A-TP  
Establishment of Operations Support )  
Systems Permanent Performance )  
Measures for Incumbent Local Exchange )  
Telecommunications Companies ) Filed: September 29, 2005

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

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

1. On September 8, 2005, BellSouth Telecommunications, Inc. filed its Responses to the Florida Public Service Commission Staff's SEEM requests, Item Nos. 2, 3, 5, 6 and 8. BellSouth's responses to these item numbers contain customer specific proprietary information. BellSouth withdraws its claim as it pertains to Item Nos. 1 and 7.

2. In order for Staff to take possession of BellSouth's responses, BellSouth is filing this Request for Specified Confidential Classification. The attachments to Item Nos. 2, 3, 5 6 and 8 contain confidential business, proprietary information. A more specific description of this information is provided in Attachment A. These items 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.

3. BellSouth is filing this Request for Confidential Classification to describe exactly what portions are proprietary.

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

DOCUMENT NUMBER-DATE

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

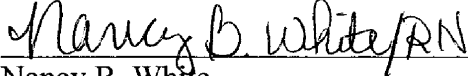
6. The information discussed in this Request for Specified Confidential Classification is valuable, BellSouth treats this business information as confidential in all requests, and this information has not been generally disclosed.

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 29<sup>th</sup> day of September, 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.

 RN

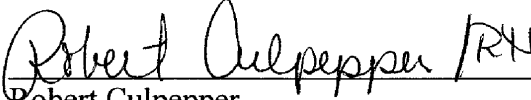
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**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000121A-TP  
Request for Confidential Classification  
Page 1 of 2  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S SEEMS  
REQUESTS, ITEM NOS. 2, 3, 5, 6 AND 8 AS FILED SEPTEMBER 8, 2005,  
IN FLORIDA DOCKET NO. 000121A-TP**

**Explanation of Proprietary Information**

1. This material is proprietary and confidential business information of a technical nature used by BellSouth in conducting its business and not commonly known by or available to the public. BellSouth derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, this document contains information related to the findings of The Liberty Consulting Group in their review of BellSouth's performance measurement plan. The network operations/systems that are necessary to implement this plan and the functions each perform, as well as specific coding of order is considered proprietary and confidential to BellSouth as it describes BellSouth's internal operations. Furthermore, this information has been prepared at great cost to BellSouth. Therefore, this information is entitled to confidential classification pursuant to Section 364.183(3)(e) of the Florida Statute.

Location

Reason

**Item No. 2**

Page 1 of 1, Lines 1-57, Column B

1

**Item No. 5**

**5(a)** – all pages

1

**5(b)** – all pages

1

**5(c)** – all pages

1

**5(d)** – all pages

1

**5(e)** – all pages

1

**5(f)** – all pages

1



**ATTACHMENT A**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000121A-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S SEEMS  
REQUESTS, ITEM NOS. 2, 3, 5, 6 AND 8 AS FILED SEPTEMBER 8, 2005,  
IN FLORIDA DOCKET NO. 000121A-TP**

<u>Location</u>	<u>Reason</u>
5(g) – all pages	1
5(h) – all pages	1
5(i) – all pages	1
5(j) – all pages	1
5(k) – all pages	1
5(l) – all pages	1
5(m) – all pages	1
5(n) - all pages	1
5(o) – all pages	1
5(p) – all pages	1
5(q) – all pages	1
 <b><u>Item No. 6</u></b>	
6a – pages 1-11, Column E, all lines	1
6b – pages 1-5, Column E. all lines	1
 <b><u>Item No. 8</u></b>	
Column I, lines 1-17	1

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000121A-TP  
Request for Confidential Classification  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S SEEMS  
REQUESTS, ITEM NOS. 2, 3, 5, 6 AND 8 AS FILED SEPTEMBER 8, 2005,  
IN FLORIDA DOCKET NO. 000121A-TP**

**2 COPIES OF PUBLIC DISCLOSURE DOCUMENT**

**ATTACHMENT C**

**BellSouth Telecommunications, Inc.  
FPSC Docket No. 000121A-TP  
Request for Confidential Classification  
Page 1 of 1  
9/29/05**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S  
RESPONSES TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S SEEMS  
REQUESTS, ITEM NOS. 2, 3, 5, 6 AND 8 AS FILED SEPTEMBER 8, 2005,  
IN FLORIDA DOCKET NO. 000121A-TP**

**PROPRIETARY COPY**