

**BellSouth Telecommunications, Inc.**  
601 W. Chestnut Street  
Room 407  
Louisville, KY 40203

Dorothy.Chambers@BellSouth.com

**Dorothy J. Chambers**  
General Counsel/Kentucky

502 582 8219  
Fax 502 582 1573

August 8, 2005

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PUBLIC SERVICE  
COMMISSION

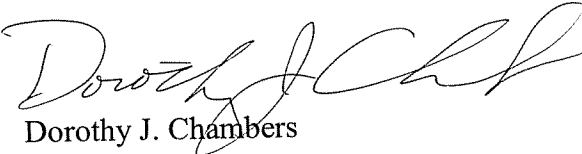
Ms. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

Re: BellSouth Telecommunications, Inc.'s Notice of Intent to Disconnect Phone-Link,  
Inc. for Non-Payment  
PSC 2005-00229

Dear Ms. O'Donnell:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of  
BellSouth Telecommunications, Inc.'s Motion for Reconsideration.

Yours very truly,

  
Dorothy J. Chambers

Enclosures

cc: Party of Record

596719

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BELLSOUTH TELECOMMUNICATIONS )  
INC.'S NOTICE OF INTENT TO DISCONNECT ) CASE NO. 2005-00229  
PHONE-LINK, INC. FOR NON-PAYMENT )

**BELLSOUTH TELECOMMUNICATIONS, INC.'S  
MOTION FOR RECONSIDERATION**

BellSouth Telecommunications, Inc., (“BellSouth”), respectfully requests the Public Service Commission of the Commonwealth of Kentucky (the “Commission”), to reconsider its denial of BellSouth’s confidentiality petition with respect to the information highlighted in the June 15, 2005, letter from Joan A. Coleman to Elizabeth O’Donnell and the May 18, 2005, from BellSouth to Phone-Link, Inc. filed June 15, 2005, pursuant to KRS 61.878(1)(c)1 and 61.878(1)(k). Specifically, the Commission found the highlighted information contained in the letters is not “valuable” to other carriers.

The information for which BellSouth seeks confidentiality is wholesale data specific to the CLEC, Phone-Link, Inc.<sup>1</sup> Specifically, the numbers reflect the amount that Phone-Link owes BellSouth for services rendered in the past to Phone-Link in Kentucky and the number of customers that Phone-Link has in Kentucky. Phone-Link is a wholesale customer of BellSouth and the information provided is classic customer proprietary network information (“CPNI”).

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<sup>1</sup> BellSouth incorporates herein its Confidentiality Petition filed in this case on June 15, 2005, including, but not limited to, the discussion of federal law and CPNI (“the 222(a) obligation”) discussed at 2 therein.

Section 222(c) of the Telecommunications Act provides that every telecommunications provider has an obligation to provide confidentiality to the network information of other carriers. While BellSouth filed the information with the Commission because BellSouth believed the information would be helpful to the Commission in considering the issues before it in this matter, this information is customer specific information to which those customers have an expectation of privacy. Indeed, the information provided to the Commission concerning specific customers is CPNI and should not be publicly disclosed without the approval of the individual customers. Disclosure of customer-specific information is subject to obligations under Section 222 of the Federal Law. Federal law imposes the obligation to maintain the confidentiality of such information (“the 222(a) obligation”). KRS 61.878(1)(k) specifically excludes from disclosure all public records or information “the disclosure of which is prohibited by federal law or regulation. . .” Accordingly, because this information is CPNI under Section 222 of the Federal Law, this information should be afforded proprietary treatment pursuant to the Kentucky Open Records Act. KRS 61.878(1)(k).

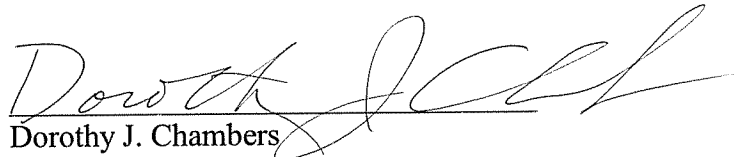
The material for which BellSouth seeks confidential treatment identified above also contains commercially valuable information. All of the information identified herein has potential value to other participants in the local exchange market, such as incumbent local exchange carriers (ILECs), competitive access providers (CAPs), facilities-based competitive local exchange carriers (CLECs), cable companies who have developed or are contemplating the development of wholesale or retail network products, and wireless providers. Public disclosure of the identified information would provide competitors with an unfair advantage.

The information provided to the Commission is proprietary. It is information provided to limited personnel within BellSouth and is not shared with the public on a CLEC-specific basis.

This Commission has been particularly sensitive to the need to maintain proprietary information as confidential. BellSouth asks the same consideration for the CLEC-specific information filed on June 15, 2005. Should the Commission deny BellSouth's request for confidential treatment, BellSouth needs to withdraw the information from the Commission's record in order to fulfill its obligations under the Telecommunications Act of 1996. 47 U.S.C. 222(c) of the Telecommunications Act.

Accordingly, for foregoing reasons as well as the reasons stated in BellSouth's Confidentiality Petition filed June 15, 2005, the Commission should reconsider its earlier decision in this matter and grant BellSouth's request for confidential treatment of the identified information based upon BellSouth's petition filed on that same date.

Respectfully submitted,



Dorothy J. Chambers  
601 W. Chestnut Street, Room 407  
P. O. Box 32410  
Louisville, KY 40232  
Telephone No.: (502) 582-8219  
Robert A. Culpepper  
Suite 4300, BellSouth Center  
675 W. Peachtree St., N.E.  
Atlanta, GA 30375  
Tel. No. (404) 335-0841

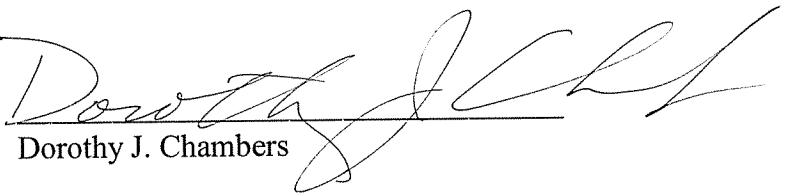
COUNSEL FOR BELL SOUTH  
TELECOMMUNICATIONS, INC.

508608

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing was served on the following individual by mailing a copy thereof, this 8th day of August 2005.

Annette Lee  
Phone-Link, Inc.  
1700 Eastpoint Parkway, Suite 270  
Louisville, KY 40223

  
Dorothy J. Chambers