at\&t

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March 30, 2006

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission 2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
Dear Ms. Bayo:

In Re: AT\&T Communications of the Southern States, LLC and affiliates Audit Control Number 05-244-2-1

Enclosed for filing is AT\&T Communications of the Southern States, LLC's (AT\&T's) Request for Confidential Treatment of information produced to the Staff in conjunction with a Staff audit of AT\&T's Regulatory Assessment Fee Forms. If you have any questions regarding this filing, please contact me at 850-425-6360 or Sonia Daniels at 404-810-8488.
ECR Attachments
GCL
OPC
cc: Ms. Jocelyn Stephens
RCA

SCR $\qquad$
SGA $\qquad$
$\operatorname{SEC} 1$
OTH $\frac{1 \text { couf }}{\text { records RECEIVED \& FILED }}$


## ORIGNA

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Audit of AT\&T Communications ) Of the Southern States, LLC's Regulatory ) Assessment Fees by the Staff of the Florida ) Public Service Commission - Audit Control ) Number 05-244-2-1

UNDOCKETED

Filed: March 30, 2006

## AT\&T OF THE SOUTHERN STATES, LLC'S REQUEST

 FOR SPECIFIED CONFIDENTIAL CLASSIFICATIONAT\&T Communication of the Southern States, LLC ("AT\&T"), pursuant to Section 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification and states as follows:

1. The Staff of the Florida Public Service Commission has been engaged in an audit of the Regulatory Assessment Fee Forms submitted by AT\&T. In conjunction with the audit, the Staff obtained certain confidential information from AT\&T regarding supporting documentation for AT\&T's Regulatory Assessment Fee forms.
2. On March 9, 2006, Staff informed AT\&T by letter that the audit field work has been completed. Included with the letter was a compilation of the audit workpapers. Portions of the audit workpapers contain information belonging to AT\&T that AT\&T considers proprietary and confidential.
3. Accordingly, pursuant to Section 364.183, Florida Statutes, and Rules 2522.006(3)(a)(2) and 25-22.006(4), Florida Administrative Code, AT\&T makes this request that the information identified in the audit workpapers be classified as proprietary and confidential and exempt from public disclosure.
4. Section 364.183 provides that information which meets certain criteria is exempt from public under Section 119.07, Florida Statutes.
5. Attachment A to this request contains a specific explanation of the proprietary information and identifies the location of the information designated as proprietary and confidential.
6. Attachment B to this request contains one copy of the audit workpapers with the confidential information highlighted.
7. Attachment C to this request contains two copies of the audit workpapers with the confidential information redacted.

WHEREFORE, based on the foregoing AT\&T respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission grant AT\&T's request that the identified information in the audit workpapers be deemed proprietary confidential business information and be held exempt from public disclosure.

Respectfully submitted this $30^{\text {th }}$ day of March, 2006.


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Attorney for AT\&T Communications of the Southern States, LLC

## ATTACHMET A

## JUSTIFICATION FOR SPECIFIC REQUESTS FOR CONFIDENTIAL CLASSIFICATION

Section 364.183 provides that confidential proprietary business information is any information that is owned or controlled by a company, is intended to be and is treated by the company as private in that the disclosure of the information would cause harm to the ratepayers or the company's business operations and has not be previously disclosed. Confidential information includes but is not limited to:
a) trade secrets
b) internal auditing controls and reports of internal auditors
c) security measures, systems, or procedures
d) information conceming bids or other contractual data
e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information
f) employee personnel information unrelated to compensation, the disclosure of which would impair the competitive business of the provider of information .

Set forth below, pursuant to Rule 25-22.006(4), are the specific descriptions of the information within the audit workpapers for which confidential classification is requested. Except as specifically noted, all of the highlighted information identified below is confidential because it is information revealing AT\&T's cost and revenue information involved in calculating Regulatory Assessment Fee payments. This information is kept confidential by AT\&T and is not publicly disclosed by the Company. The disclosure of this information would allow competitors a window into the internal
financial operations of AT\&T and would harm or impair AT\&T's competitive business
interests. The proprietary confidential business information is identified as follows:

| Page 1, lines 11-20 | Page 42, lines 11-20 |
| :---: | :---: |
| Page 2, lines 12-21 | Page 43, lines 10-17 |
| Page 3, lines 11-18 | Page 44, lines 11-20 |
| Page 4, lines 1-13 | Page 45, lines 12-21 |
| Page 5, lines 1-13 | Page 46, lines 10-29 |
| Page 6, lines 1-13 | Page 47, lines 12-20 |
| Page 7, lines 12-20 | Page 48, lines 12-20 |
| Page 8, lines 1-13 | Page 49, lines 11-21 |
| Page 9, lines 1-13 | Page 50, column A |
| Page 10, lines 1-13 | Page 51, columns A and B |
| Page 11, lines 1-12 | Page 52, lines 1-38 |
| Page 12, lines 1-12 | Page 53, lines 12-27 |
| Page 13, lines 1-12 | Page 54, columns A and B |
| Page 14, lines 1-12 | Page 55, columns $\mathrm{A}, \mathrm{B}$ and C |
| Page 15, lines 1-12 | Page 56, lines 1-38 |
| Page 16, lines 1-13 | Page 57, lines 1-45 |
| Page 17, lines 1-13 | Page 58, lines 46-88 |
| Page 18, lines 1-13 | Page 59, columns A, B and C |
| Page 19, lines 1-13 | Page 60, lines 1-38 |
| Page 20, lines 1-13 | Page 61, column A |
| Page 21, lines 1-13 | Page 62, lines 1-39 |
| Page 22, lines 12-20 | Page 63, lines 40-85 |
| Page 23, lines 11-23 | Page 64, columns A, B and C |
| Page 24, lines 13-20 | Page 65, lines 1-38 |
| Page 25, lines 13-20 | Page 66, lines 1-27 |
| Page 26, lines 13-20 | Page 67, column A |
| Page 27, lines 12-20 | Page 68, columns A, B and C |
| Page 28, lines 14-21 | Page 69, columns A and B |
| Page 29, lines 12-21 | Page 70, columns A, B and C |
| Page 30, lines 12-20 | Page 71, lines 1-45 |
| Page 31, lines 9-16 | Page 72, columns A and B |
| Page 32, lines 11-22 | Page 73, columns A, B and C |
| Page 33, lines 12-22 | Page 74, lines 1-38 |
| Page 34, lines 11-21 | Page 75, lines 1-27 |
| Page 35, lines 11-21 | Page 76, column A |
| Page 36, lines 11-21 | Page 76A, columns A, B and C |
| Page 37, lines 11-22 | Page 77, lines 1-8 |
| Page 38, lines 11-20 | Page 78, columns A and B |
| Page 39, lines 12-22 | Page 79, lines 1-6 |
| Page 40, lines 12-20 | Page 80, columns A-F |
| Page 41, lines 12-20 | Page 81, columns A and B |

Page 82, lines 1-6
Page 83, lines 1-7
Page 84, columns A and B
Page 85, lines 1-5
Page 86, lines 1-11
Page 87, lines 1-11
Page 88, columns A and B
Page 89, lines 2-8
Page 90, column A
Page 91, column A
Page 92, column A
Page 93, column A
Page 94, column A
Page 95, column A
Page 96, lines 1-6
Page 97, lines 1-6
Page 98, column A
Page 99, column A
Page 100, column A
Page 101, column A
Page 102, column A
Page 103, column A
Page 104, column A
Page 105, column A
Page 106, column A
Page 107, lines 1-30
Page 108, columns A-I
Page 109, columns A-G
Page 110, columns A-I
Page 111, columns A and B
Page 112, lines 1-18
Page 113, columns A and B
Page 114, lines 1-19
Page 115, lines 1-13
Page 116, columns A and B
Page 117, lines 1-23
Page 118, columns A and B
Page 119, lines 1-19
Page 120, columns A and B
Page 121, lines 1-17
Page 122, columns A and B
Page 123, lines 1-18
Page 124, lines 1-9
Page 125, lines 1-7
Page 126, columns A-G
Page 127, columns A-H

Page 128, columns A-E
Page 129, lines 1-12
Page 130, lines 1-12
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