

Manuel A. Gurdian  
Attorney

AT&T Florida  
150 South Monroe Street  
Room 400  
Tallahassee, Florida 32301  
(305) 347-5561

**ORIGINAL**

July 17, 2007

RECEIVED-HPSC  
07 JUL 17 PM 4:13  
COMMISSION CLERK

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No.: 060822-TL  
Petition of BellSouth Telecommunications, Inc. for Relief from  
Carrier-of-Last-Resort Obligations (COLR) Pursuant to Florida  
Statutes §364.025(6)(d) for two private subdivisions in Nocatee  
development**

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for its Responses to Staff's First Set of Interrogatories No. 18 and First Request for Production of Documents Nos. 3, 4, 5, 6, 7, 13, 14, 16 and 17, which we ask that you file in the captioned docket.

Copies were served to the parties shown on the attached Certificate of Service.

Sincerely,

*Manuel A. Gurdian*  
Manuel A. Gurdian

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 2 Enclosures
- OPC \_\_\_\_\_ cc: All Parties of Record
- RCA \_\_\_\_\_ Jerry D. Hendrix
- SCR \_\_\_\_\_ E. Earl Edenfield, Jr.
- SGA \_\_\_\_\_ James Meza III
- SEC \_\_\_\_\_
- OTH 1 copy  
records

This confidentiality request was filed by or for a "telco" for DN 060822-07. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

*(x-ref. 05095-07)*

DOCUMENT NUMBER-DATE

06003 JUL 17 07

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 060822-TL**

I HEREBY CERTIFY that a true and correct copy was served via (\*) Electronic Mail and First Class U. S. Mail this 17th day of July, 2007 to the following:

**Florida Public Service Commission**  
Patrick Wiggins, Staff Counsel (\*)(\*\*)  
Rick Mann, Staff Counsel (\*)(\*\*)  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
[pwiggins@psc.state.fl.us](mailto:pwiggins@psc.state.fl.us)  
[rmann@psc.state.fl.us](mailto:rmann@psc.state.fl.us)

**Nocatee Development Company**  
Attention: Richard T. Ray  
4314 Pablo Oaks Court  
Jacksonville, Florida 32224

Anne T. Klinepeter, Registered Agent  
4314 Pablo Oaks Court  
Jacksonville, FL 32224

**The Parc Group, Inc.**  
Attention: Richard T. Ray  
4314 Pablo Oaks Court  
Jacksonville, Florida 32224

Anne T. Klinepeter, Registered Agent  
4314 Pablo Oaks Court  
Jacksonville, FL 32224

**SONOC Company, LLC**  
Attention: Richard T. Ray  
4310 Pablo Oaks Court  
Jacksonville, Florida 32224

DDI, Inc., Registered Agent  
4310 Pablo Oaks Court  
Jacksonville, FL 32224

**Toll Jacksonville Limited Partnership**  
250 Gibraltar Road  
Horsham, PA 19044

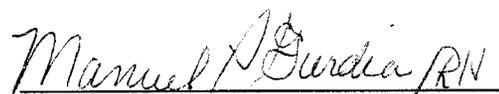
CT Corporation System, Registered Agent  
1200 South Pine Island Road  
Plantation, FL 33324

**Pulte Home Corporation**  
c/o Jane Celofsky, Legal Dept.  
100 Bloomfield Hills Parkway  
Suite 300  
Bloomfield Hills, MI 48304

CT Corporation System, Registered Agent  
1200 South Pine Island Road  
Plantation, FL 33324

**Nocatee Development Company/SONOC Company LLC**  
M. Lynn Pappas (\*)  
c/o Pappas Law Firm  
245 Riverside Avenue, Suite 400  
Jacksonville, FL 32202  
Tel. No. (904) 353-1980  
Fax No. (904) 353-5217  
[lpapas@papnet.com](mailto:lpapas@papnet.com)

Floyd R. Self (+)(\*)(\*\*)  
Messer Caparello & Self, P.A.  
Regional Center Office Park  
2618 Centennial Place  
P.O. Box 15579 (32317)  
Tallahassee, FL 32308  
Tel. No. (850) 222-0720  
Fax. No. (850) 224-4359  
[fself@lawfla.com](mailto:fself@lawfla.com)  
Represents Nocatee

  
Manuel A. Gurdian

(+) Signed Protective Agreement

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of BellSouth for Relief from ) Docket No: 060822-TL  
Carrier-of-Last-Resort Obligations Pursuant )  
To Florida Statutes §364.025(6)(d) ) Filed: July 17, 2007  
\_\_\_\_\_ )

**AT&T FLORIDA'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files its Request for Specified Confidential Classification.

1. On June 26, 2007, AT&T Florida filed its Responses to Florida Public Service Commission Staff's (hereinafter "Staff") First Set of Interrogatories (Nos. 1-23) and First Request for Production of Documents (Nos. 1-18) along with a Notice of Intent to Request Specified Confidential Classification. The attachment to AT&T Florida's Response to Staff's First Set of Interrogatories, No. 18 and the documents produced in Response to Request for Production Nos. 3, 4, 5, 6, 7, 14, 16 and 17 contain information that is confidential and proprietary to AT&T Florida.

2. Pursuant to Rule 25-22.06(3)(a), AT&T Florida hereby files this Request for Specified Confidential Classification because the information contained in AT&T Florida's Responses to Staff's First Set of Interrogatories No. 18 and First Request for Production Nos. 3, 4, 5, 6, 7, 14, 16 and 17 contain confidential business information related to competitive interests utilized by AT&T Florida to conduct its business. A more specific description of this information is contained in Attachment A. In addition, public disclosure of this information would cause harm to AT&T Florida. Therefore, such

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information should be classified as confidential business information pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.

7. Attachment A to AT&T Florida'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 AT&T Florida as confidential.

8. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the document containing the confidential information.

9. Attachment C to AT&T Florida's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

10. The original of this Request was filed today with the Office of the Commission Clerk and a copy was served on the Parties.

WHEREFORE, based on the foregoing, AT&T Florida 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 17th day of July, 2007.

AT&T FLORIDA

*James Meza III /RU*

JAMES MEZA III  
AUTHORIZED HOUSE COUNSEL NO. 464260  
TRACY W. HATCH  
MANUEL A. GURDIAN  
c/o Nancy H. Sims  
150 So. Monroe Street, Suite 400  
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(305) 347-5558

*E. Earl Edenfield Jr. /RU*

E. EARL EDENFIELD JR.  
AT&T Southeast  
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675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0763

684569

**ATTACHMENT A**

**AT&T FLORIDA  
FPSC DOCKET NO: 060822-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 5  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES NO. 18 AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3, 4, 5, 6, 7, 13,  
14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL**

**Explanation of Proprietary Information**

1. This information contains confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to AT&T Florida's net present value and cumulative cash flow analysis that are not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. 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 competitive business information. The subject information includes internal network methods and procedures, network design standards and guidelines and/or job aids. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which 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. This information contains confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to AT&T Florida's estimated costs for network deployment for two private subdivisions that are not publicly available. This information further contains AT&T Florida's Network Cost Design jobs that provide information related to how AT&T Florida determines the cost of the project. These documents are not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. 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**

**AT&T FLORIDA  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
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FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3, 4, 5, 6, 7, 13,  
14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL**

**Explanation of Proprietary Information**

4. 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 revenue, the line counts of customers who have bundles and/or features and the average revenue per customer. 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.
5. This information contains confidential, proprietary business information of BellSouth. BellSouth strives to keep this information confidential and not publicly disclose the information. This information contains detailed budget, accounting, financial and strategic information for BellSouth. Disclosure of revenue accounting and business costs could give competitors a clear picture of the resources required to provide services. Knowledge of such resource requirements could harm the competitive interests of BellSouth.

ATTACHMENT A

AT&T FLORIDA  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
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14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
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**Attachment to Interrogatory, Item No. 18**

<u>Location</u>	<u>Reason</u>
All numeric values, dollar amounts and percentages on all pages	1

**Request for Documents, Item No. 3**

<u>Location</u>	<u>Reason</u>
Entire Document	2

**Request for Documents, Item No. 4**

<u>Location</u>	<u>Reason</u>
Entire Document	2

**Request for Documents, Item No. 5**

<u>Location</u>	<u>Reason</u>
Entire Document	2

**Request for Documents, Item No. 6**

<u>Location</u>	<u>Reason</u>
Entire Document	3

ATTACHMENT A

AT&T FLORIDA  
FPSC DOCKET NO. 060822-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES NO. 18 AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3, 4, 5, 6, 7, 13,  
14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL

**Request for Documents, Item No. 7**

<u>Location</u>	<u>Reason</u>
Entire Document	2

**Request for Documents, Item No. 14**

<u>Location</u>	<u>Reason</u>
All numeric values, dollar amounts and percentages on all pages	4

**Request for Documents, Item No. 14 -**

**File "POD 14 PTIPTON FL ARPU 11282006 PROPRIETARY.xls"**

<u>Location</u>	<u>Reason</u>
Entire Document	4

ATTACHMENT A

AT&T FLORIDA  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
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14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL

**Request for Documents, Item No. 16**

<u>Location</u>	<u>Reason</u>
All numeric values, dollar amounts and percentages on all pages	5

**Request for Documents, Item No. 17**

<u>Location</u>	<u>Reason</u>
Entire Document	3

**ATTACHMENT B**

**AT&T FLORIDA  
FPSC DOCKET NO: 060822-TL  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES NO. 18 AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3, 4, 5, 6, 7, 13,  
14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**AT&T FLORIDA  
FPSC DOCKET NO: 060822-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 1  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO STAFF'S FIRST SET OF INTERROGATORIES NO. 18 AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3, 4, 5, 6, 7, 13,  
14, 16 AND 17, FILED FEBRUARY 9, 2007 IN  
FLORIDA DOCKET NO. 060822-TL**

**ONE HIGHLIGHTED COPY**

State of Florida



**Public Service Commission**  
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** 7/17/07  
**TO:** Manuel Gurdian  
**FROM:** M Lockard, Division of the Commission Clerk &  
Administrative Services  
**RE:** **Acknowledgment of Receipt of Confidential Filing**

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This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 060822-TL or (if filed in an undocketed matter) concerning Responses to staff's 1st Interrog + 1st RPDs, and filed on behalf of AT+T Florida. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-6770.

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**CONFIDENTIAL**

PSC/CCA019-C(Rev 12/06)

DOCUMENT NUMBER-DATE

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