



Manuel A. Gurdian
 Attorney
 Legal Department

AT&T Florida
 150 South Monroe Street
 Suite 400
 Tallahassee, FL 32301

T: (305) 347-5561
 F: (305) 577-4491
manuel.gurdian@att.com

RECEIVED-FPSC
 07 AUG 29 PM 4:34
 COMMISSION
 CLERK
 RUN

August 29, 2007

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

**Re: Docket No. 070126-TL: Petition of AT&T Florida for Relief from
 Carrier-of-Last-Resort Obligations Pursuant to Florida Statutes
 § 364.025(6)(d) (Avalon)**

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 Request for Production Nos. 1 and 5 and *Supplemental* Response to No. 1, which we ask that you file in the captioned docket.

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

Sincerely,



Manuel A. Gurdian

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 3 _____
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH 1 conf records

cc: All parties of record
 Jerry Hendrix
 E. Earl Edenfield, Jr.
 James Meza III

This confidentiality request was filed by or for a "telco" for DNO 07822-07. 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. DNS 06937-07 & 07027-07)

DOCUMENT NUMBER-DATE

07821 AUG 29 07

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 070126-TL

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

(*) Electronic Mail and First Class U. S. Mail this 29th day of August, 2007 to the following:

Patrick Wiggins (*)
Rick Mann (*)
Adam Teitzman (*)
Theresa Tan (*)
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
pwiggins@psc.state.fl.us
rmann@psc.state.fl.us
ateitzma@psc.state.fl.us
ltan@psc.state.fl.us

Avalon Development, LLC
Attn: Stokes & Griffith Properties, LLC
Registered Agent
John C. Kunkel
4315 Pablo Oaks Court
Suite 1
Jacksonville, FL 32224-9667

Stokes & Griffith Properties, LLC
Attn: Chester E. Stokes, Jr.
Registered Agent
Chester E. Stokes, Jr.
4315 Pablo Oaks Court
Suite 1
Jacksonville, FL 32224-9667

Richmond American Homes of FL, LP
Attn: RAH of Florida, Inc.
4350 South Monaco Street
Suite 500
Denver, Colorado 80237

Registered Agent
Richmond American Homes of FL, LP
c/o CT Corporation System
1200 South Pine Island Road
Plantation, Florida 33324

Lindhorst Construction, Inc.
Attn: Dale A. Lindhorst
5119 Commercial Way
Spring Hill, Florida 34606

Registered Agent
Dale Lindhorst
4393 Mallard Lake Drive
Brooksville, FL 34609

Lexington Homes, Inc.
Attn: Craig S. Gallagher
6115 Guilford Drive
New Port Richey, FL 34655

Registered Agent
Craig J. Fiebe
5623 US Highway 19
Suite 201
New Port Richey, FL 34652

William Ryan Homes Florida, Inc.
Attn: Martin M. Ryan
3925 Coconut Palm Avenue
Suite 117
Tampa, FL 33619

Registered Agent
William Ryan Homes Florida, Inc.
c/o CT Corporation System
1200 South Pine Island Road
Plantation, FL 33324

Walt Steimel (*)
Greenberg Traurig
800 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20006
Tel. No. (202) 452-4893
steimelw@gtlaw.com

Mallory Gayle Holm
Vice President
Avalon Development, LLC
4315 Pablo Oaks Court
Jacksonville, FL 32224



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Florida for Relief from) Docket No: 070126-TL
Carrier-of-Last-Resort Obligations Pursuant)
To Florida Statutes §364.025(6)(d) (Avalon)) Filed: August 29, 2007
_____)

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

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 August 8, 2007, AT&T Florida filed its Responses to Staff's First Set of Interrogatories and First Request for Production of Documents. On August 9, 2007, AT&T Florida filed its *Supplemental* Response to Staff's First Request for Production of Documents No. 1. AT&T Florida's Responses to Request for Production Nos. 1 and 5 contain information to be considered confidential business information. A Notice of Intent to Request Specified Confidential Classification was also filed on August 8, 2007.

2. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because the above documents contain information considered confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. A more specific description of this information is contained in Attachment A.

3. Public disclosure of this information would cause competitive harm to AT&T Florida and provide competitors with an unfair advantage. The information discussed in this Request for Specified Confidential Classification is

DOCUMENT NUMBER-DATE

07821 AUG 29 07

FPSC-COMMISSION CLERK

valuable and AT&T Florida strives to keep it secret. Therefore, such 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*.

4. 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.

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

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

7. 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 29th day of August, 2007.

AT&T FLORIDA



JAMES MEZA III
Authorized House Counsel No. 464260
TRACY W. HATCH
MANUEL A. GURDIAN
c/o Gregory R. Follensbee
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558



E. EARL EDENFIELD JR.
AT&T Southeast
Suite 4300, AT&T Midtown Center
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0763

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 070126-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 2
8/29/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 1 AND 5 AND AT&T FLORIDA'S SUPPLEMENTAL
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NO. 1, FILED AUGUST 8 AND AUGUST 9, 2007 IN
FLORIDA DOCKET NO. 070126-TL**

Explanation of Proprietary Information

1. This information contains confidential, trade secret business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to correspondence containing negotiations back and forth between AT&T Florida and Avalon. These negotiations concern proposals regarding easements, architecture, technology and timelines for deployment of facilities. This information is not publicly available and 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 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
FPSC DOCKET NO: 070126-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 2 OF 2
8/29/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 1 AND 5 AND AT&T FLORIDA'S SUPPLEMENTAL
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NO. 1, FILED AUGUST 8 AND AUGUST 9, 2007 IN
FLORIDA DOCKET NO. 070126-TL**

Request for Documents, Item No. 1

Location	Reason
Page Nos. 1-3,	1
Portions of Page 9	1
Page Nos. 12-16	1
Page Nos. 22-57	1
Page Nos. 60-64	1
Page Nos. 67-80	1
Page Nos. 84-114	1
Portions of Page 116	1
Page Nos. 117 and 118	1
Portions of Page 119	1
Pages 121-133	1
Pages 135-139	1

Request for Documents, Item No. 5

Location	Reason
Entire Document	2

ATTACHMENT B

**AT&T FLORIDA
FPSC DOCKET NO: 070126-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 1
8/29/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 1 AND 5 AND AT&T FLORIDA'S SUPPLEMENTAL
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NO. 1, FILED AUGUST 8 AND AUGUST 9, 2007 IN
FLORIDA DOCKET NO. 070126-TL**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**AT&T FLORIDA
FPSC DOCKET NO: 070126-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 1
8/29/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 1 AND 5 AND AT&T FLORIDA'S SUPPLEMENTAL
RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS, NO. 1, FILED AUGUST 8 AND AUGUST 9, 2007 IN
FLORIDA DOCKET NO. 070126-TL**

ONE HIGHLIGHTED COPY

STATE OF FLORIDA

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: 8/29/07

TO: M. Gurdian\AT&T

FROM: Ruth Nettles, Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 070126-TL or, if filed in an undocketed matter, concerning Responses to staff's 1st request for PODs, Nos. 1 and 5, and filed on behalf of AT&T. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER-DATE
07822 AUG 29 06
FPSC-COMMISSION CLERK

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850
An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us