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October 8, 2007

COMMISSION COMMISSION

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

Re: <u>Docket No. 060598-TL</u>: Petition by BellSouth

Telecommunications, Inc., pursuant to Florida Statutes

§364.051(4), to Recover 2005 Tropical System Related Costs and

Expenses

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 Replacement Hearing Exhibit No. 15, which we ask that you file in the captioned docket.

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

This confidentiality request was filed by or for a "telco" for DN <u>O (3) (6)</u> 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-ret. 08481-07

DOCUMENT NUMBER - DATE

09215 OCT-85

SGA ____

SEC ____

OTH _

CERTIFICATE OF SERVICE Docket No. 060598-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 8th day of October, 2007 to the following:

Richard Bellak
Patrick Wiggins
Adam Teitzman
Theresa Lee Eng Tan
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Florida Public Service
Commission
Division of Legal Services
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Represents NuVox
Represents CompSouth

NuVox Communications, Inc. Susan J. Berlin (+) Two North Main Street Greenville, SC 29601 Phone: 864-331-7323 Fax: 864-672-5105 sberlin@nuvox.com

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Manuel A. Gurdian

(+) Signed Protective Agreement

FLORIDA PUBLIC SERVICE COMMISSION

| In Re: Petition to recover 2005 tropical system |) Docket No. 060598-TL |
|---|--------------------------|
| related costs and expenses, by BellSouth |) |
| Telecommunications, Inc. |) |
| |) Filed: October 8, 2007 |

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 17, 2007, AT&T Florida filed a *replacement* copy of Hearing Exhibit No. 15 which contained AT&T Florida's Confidential Responses to Staff's audit requests. Portions of these documents have already been protected under two separate Requests for Specified Confidential Classification filed on November 13, 2006 and December 13, 2006. A Notice of Intent to Request Specified Confidential Classification was filed on September 17, 2006 for the remaining documents that were not protected under the two previously filed Requests for Specified Confidential Classification.
- 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 Reventage. The information ng215 0CT-85

discussed in this Request for Specified Confidential Classification is 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*. In addition, portions of the information are considered customer account records pursuant to Section 364.24, *Florida Statutes*. Accordingly, the information 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 8th day of October, 2007.

AT&T FLORIDA

JAMES MEZA III

Authorized House Counsel No. 464260

TRACY W. HATCH

MANUEL A. GURDIAN

c/o Gregory R. Follensbee

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E. EARL EDENNELD JR.

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AT&T Florida FPSC Dkt No. 060598-TL Replacement Hearing Exhibit No. 15 Page 1 of 4 10/8/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-TL

Explanation of Proprietary Information

- 1. 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, 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.
- 2. This information contains drawings and information of BellSouth's network. This information is considered to be proprietary and confidential business information. Public disclosure of this information would impair BellSouth's ability to keep the communications network secure. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret.
- 3. This information contains confidential, proprietary business information of BellSouth and third-party vendors. In particular, this information contains prices that AT&T Florida has negotiated with specific vendors. The subject information lists these prices, frequently discounted, that AT&T Florida receives on particular items of equipment. If this information were publicly disclosed, it would impair AT&T Florida's ability to obtain favorable discounts in the future. BellSouth is contractually required to keep this information confidential and not publicly disclose the information.

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-TL

Explanation of Proprietary Information

4. This information contains confidential, proprietary business information of BellSouth and third-parties. BellSouth is contractually required to keep this information confidential and not publicly disclose the information.

In particular, this information contains a list of CLECs that BellSouth has interconnection agreements with and the number of wholesale lines of each. Florida Statutes Section 364.24, provides that "any telecommunications company shall not intentionally disclose customer account records except as authorized by the customer or as necessary for billing purposes, or required by subpoena, court order, other process of court, or as otherwise allowed by law."

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-TL

Replacement Hearing Exhibit No. 15 (CD ROM):

| File Name | Location | <u>Reason</u> |
|---|-------------|---------------|
| Attachment_Req_No_18.xls | Entire File | 1 |
| Attachment_Request_18.pdf | Entire File | 1 |
| Attachment_Request_19. xls | Entire File | 1 |
| Attachment_Request_20. xls | Entire File | 1 |
| Attachment_Request_21. xls | Entire File | 1 |
| Attachment_Request_22. xls | Entire File | 1 |
| Attachment_Request_23. xls | Entire File | 1 |
| Attachment_Request_24. xls | Entire File | 1 |
| Attachment_Request_27. xls | Entire File | 1 |
| Attachment_Request_28_Attach_1.xls | Entire File | 3 |
| Attachment_Request_28_Attach_2.xls | Entire File | 3 |
| Attachment_Request_29. xls | Entire File | 1 |
| Attachment_Request_30_Supp_GLC.xls | Entire File | 1 |
| Attachment_Request_30_Attach_1.xls | Entire File | 1 |
| Attachment_Request_30_Supplemental | | |
| Data.xls | Entire File | 1 |
| Attachment_Request_32. xls | Entire File | 1 |
| Attachment_Request_No_8_2 nd _Supp.xls | Entire File | 1 |
| Attachment_Request_No_8_Supp_ | | |
| Attachment_1.xls | Entire File | 1 |
| Attachment_Request_No_8_Supp_ | | |
| Attachment_2.xls | Entire File | 1 |

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-TL

Replacement Hearing Exhibit No. 15 (CD ROM):

| File Name | Location | Reason |
|---------------------------------|----------------------------------|--------|
| CPNI_Attachment_Request_No_4xls | Pgs 1-8, Customer Name Column | 4 |
| Request_No_1.pdf | Pgs 5-20, Entire Page | 1 |
| Request_No_10.pdf | Pg 3-4, Response | 2 |
| . – – , | Pgs 5-11, Entire Page | 2 |
| Request_No_30.pdf | Pg 2, Response | 1 |
| Request_No_33_34.pdf | Pgs 4-12 and 15-20, | |
| | Entire Page | 3 |
| Request_No_33_34_Supps.pdf | Pgs 4-5 and 8-9, | |
| | Entire Page | 3 |
| Request_Nos_19_22_SUPPS.pdf | All \$\$ Amounts in Respons | se 1 |
| Req_28_Feb_06.pdf | Entire File | 3 |
| Req_28_Sept_05.pdf | Entire File | 3 |
| Req_29_Jun_05.pdf | Entire File | 3 |
| Req_29_Nov_05.pdf | Entire File | 3 |
| Req_29_Sept_05.pdf | Entire File | 3 |
| Req_32_Aug_05.pdf | Entire File | 3 |
| Req_32_June_05.pdf | Entire File | 3 |
| Req_32_Nov_05.pdf | Entire File | 3 |

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-TL

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF REPLACEMENT HEARING EXHIBIT NO. 15, FILED SEPTEMBER 17, 2007 IN FLORIDA DOCKET NO. 060598-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

Aublic Service Commission FIDENTIAL

ACKNOWLEDGEMENT

| | DATE: _10/8/07 |
|-------|---|
| ТО: | 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 060598-TL or, if filed in an undocketed matter, concerning Replacement Hearing Exhibit No. 15 [filed on CD and hardcopy], 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.

FD&C-COMMISSION CLERK

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PSC/CLK 019-C (Rev. 05/07)