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CONFIDENTIAL

08 JAN 11

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Please refer to our file number: 12897-3

January 11, 2008

VIA FEDERAL EXPRESS

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

070560-TI

This confidentiality request was filed by or for a "telco" for DN 00316-08. 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. (See DN 11201-07)

COMMISSION CLERK

08 JAN 11 PM 1:00

RECEIVED-FPSC

**Re: Compliance Investigation of Virtual Reach Corporation for apparent violation of Rules 25-470, F.A.C., Registration Required, and 25-22.032(6)(b), F.A.C., Customer Complaints.**

Dear Ms. Cole:

Pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, by and through its undersigned counsel and by this letter, Qwest Communications Corporation's ("QCC") hereby files a Request for Confidential Classification ("Request") in connection with its Response to the November 26, 2007, Subpoena from the Florida Public Service Commission ("Response"), which we ask that you file in the captioned

CMP 1 docket.

COM \_\_\_\_\_ Also, please find attached in a sealed confidential envelope one original unredacted copy  
CTR \_\_\_\_\_ of QCC's Response (Exhibit A), which includes a CD-ROM disk and highlights the specific  
ECR \_\_\_\_\_ information claimed to be confidential. Also, please find two redacted copies of QCC's  
GCL 1 Response (Exhibit B), and a detailed field-by-field justification exhibit supporting QCC's  
Request (Exhibit C).

OPC \_\_\_\_\_ QCC understands that the information at issue in QCC's Response (Exhibit A) is exempt  
RCA \_\_\_\_\_ from Section 119.07(1), Florida Statutes, and the Commission will accord it the stringent  
SCR \_\_\_\_\_ protection from disclosure required by Rule 25-22.006(3)(d), Florida Administrative Code, until  
SGA \_\_\_\_\_ returned to QCC.

SEC \_\_\_\_\_ SARASOTA, FLORIDA VENICE, FLORIDA TALLAHASSEE, FLORIDA DENVER, COLORADO

OTH 1 conf records ABEL BAND, CHARTERED DOCUMENT NUMBER-DATE

923336v.1

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FPSC-COMMISSION CLERK

**Docket No. 070560-TI**

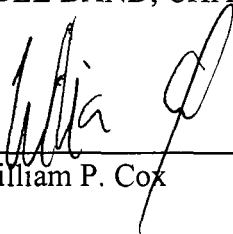
January 11, 2008

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Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to me in the enclosed self-addressed envelope. If there are any questions regarding this filing, please contact me at 941-364-2733.

Very truly yours,

ABEL BAND, CHARTERED



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William P. Cox

WPC:dac

cc: Barbara J. Brohl, Esq. (excluding Exhibit "A" CD ROM)  
Adam L. Sherr, Esq. (excluding Exhibit "A" CD ROM)

**BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA**

In re: Docket No. 070560-TI - Compliance )  
Investigation of Virtual Reach Corporation for )  
Apparent Violation of Rules 25-470, F.A.C., )  
Registration Required, and 25-22.032(6)(b), )  
F.A.C., Customer Complaints )

Filed: January 11, 2008

**QWEST COMMUNICATIONS CORPORATION'S REQUEST FOR  
CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, Florida Administrative Code, Qwest Communications Corporation (hereinafter "QCC" or "Qwest"), by and through its undersigned counsel, seeks confidential classification and a protective order from the Florida Public Service Commission ("Commission") for information contained in its response to the November 26, 2007, Subpoena from the Commission in the above-captioned docket. In support of its Request and Motion, QCC respectfully states as follows:

1. All of the information for which QCC seeks confidential treatment falls within Section 364.183, Florida Statutes, which defines "proprietary confidential business information" as:

Information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Section 364.183(d), Florida Statutes provides that "proprietary confidential business information" includes "information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services

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on favorable terms.” Section 364.183(e), Florida Statutes, further provides that “proprietary confidential business information” includes “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.”

2. If competitors were able to acquire this detailed and sensitive information regarding QCC, they could more easily develop entry and marketing strategies to ensure success in competing with QCC. This would afford them an unfair advantage while severely jeopardizing QCC’s competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer. Accordingly, QCC respectfully requests that the Commission classify the identified information as confidential and enter an appropriate protective order.

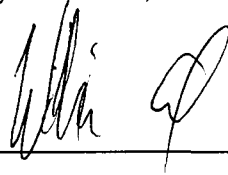
3. While a ruling on this request is pending, QCC understands that the information at issue is exempt from Section 119.07(1), Florida Statutes, and the Commission will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d), Florida Administrative Code.

4. One copy of the confidential information is attached to the original of this Request on yellow paper in a sealed envelope as Exhibit A. Two redacted copies are provided as Exhibit B. A detailed, field-by-field justification of the confidentiality of the information at issue is attached as Exhibit C.

**DATED** this 11th day of January 2008.

Respectfully submitted,

By: \_\_\_\_\_



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STATE OF FLORIDA



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COMMISSION CLERK  
(850) 413-6770

**CONFIDENTIAL**

**Public Service Commission**

**ACKNOWLEDGEMENT**

DATE: January 11, 2008

TO: Abel Band Law Firm/William P. Cox

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 070560-T1 or, if filed in an undocketed matter, concerning Information contained in response to 11/26/07 subpoena from Commission (on hard copy and CD), and filed on behalf of Qwest Communications Corporation. 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  
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