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January 16, 2008

**VIA HAND DELIVERY**

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

Re: ~~Undocketed~~ <sup>080065-TX</sup> Matter - Claim of Confidentiality for Data Responses

Dear Ms. Cole:

Enclosed for filing in the Commission's Undocketed Matter file for 2008, please find an original and 7 copies of VCI Company d/b/a Vilaire Communications' Claim of Confidentiality for Certain Documents Submitted in Response to Post-Audit Questions. Included with this filing are on highlighted copy of the confidential material, and two redacted copies, in accordance with Rule 25-22.006, F.A.C.

- CMP 1
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 1
- OPC \_\_\_\_\_
- RCA** \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH 1 conf records

Thank you for your assistance with this filing, and please do not hesitate to contact me if

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 00428-08. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.  
(See DN 10380-07)

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Ms. Ann Cole  
January 16, 2008  
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you have any questions or concerns.

Sincerely,



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**Beth Keating**  
**AKERMAN SENTERFITT**  
106 East College Avenue, Suite 1200  
Tallahassee, FL 32302-1877  
Phone: (850) 224-9634  
Fax: (850) 222-0103

Enclosures

cc: Stacey A. Klinzman  
VCI Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Claim of Confidentiality ) Filed: January 16, 2008  
for Certain Information Submitted to Staff in )  
Response to Post-Audit Questions ) ~~Undocketed~~ 080065-TX

VCI COMPANY D/B/A VILAIRE COMMUNICATIONS' CLAIM  
OF CONFIDENTIALITY FOR CERTAIN DOCUMENTS  
SUBMITTED TO STAFF IN RESPONSE TO POST-AUDIT QUESTIONS

VCI Company d/b/a Vilaire Communications ("Company" or "Petitioner"), pursuant to Section 364.183(1), F.S., and Rule 25-22.006 (5), F.A.C., submits this Claim of Confidentiality ("Claim") for the information ("Confidential Information") described below. The Confidential Information is submitted to the Florida Public Service Commission ("Commission") in response to certain post-audit questions posed by Commission staff ("Staff") during a January 9, 2008 teleconference. The Company provides the following information in support of its Claim:

1. The exact name of Claimant and the address of its principal office are:

VCI Company (doing business in Florida as Vilaire Communications)  
2228 S. 78<sup>th</sup> Street  
Tacoma, Washington 98409-9050

2. The names and addresses of the persons authorized to receive correspondence and communications with respect to this Claim are:

Stanley J. Johnson, President Stan Efferding, Secretary/Treasurer VCI Company 2228 S 78 <sup>th</sup> Street Tacoma, Washington 98409-9050 Tel Johnson: (253) 973-2476 Tel Efferding: (206) 419-5948 E-mail: stanj@vcicompany.com (Johnson) E-mail: Vilaire@Comcast.net (Efferding)	Stacey A. Klinzman, Regulatory Attorney VCI Company 2228 S. 78 <sup>th</sup> Street Tacoma, Washington 98409-9050 Tel: (253) 830-0056 E-mail: staceyk@vcicompany.com
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3. Staff's final report for Audit Control No. 07-250-1-2 was issued November 19, 2007. Staff subsequently requested VCI Company to attend a teleconference to be held January 9, 2008 at which additional questions would be posed by Staff based upon the final audit report. Upon VCI's request, Staff Attorney, Lee Eng Tan, provided, via electronic mail on January 8, 2008, a list of questions to be addressed during the January 9, 2008 teleconference. Ms. Tan also stated in connection with VCI's request that additional questions would be posed orally at the teleconference. The list provided by Attorney Tan indicated in the upper left hand corner that the items are "Post Audit Discussion Questions."

4. During the teleconference, Staff confirmed that the audit previously conducted under Audit Control Number 07-250-1-2 is now closed. At the end of the teleconference, Staff requested VCI to submit additional information, in writing, in response to questions raised during the teleconference. The post-audit questions to be responded to were clarified by Lee Eng Tan in an e-mail transmitted to VCI on January 14, 2008 (the "January 14 Questions").

5. VCI believes that the Confidential Information submitted to Staff in response to the post-audit January 14 Questions should be classified as confidential under § 364.183(1) and 25-22.006(5), Access to company records and exempt from the public disclosure requirements of §119.07(1), F.S.

6. The Confidential Information submitted in response to the post-audit January 14, 2008 Questions is owned and controlled by VCI, is intended to be and is treated by the company as confidential, and constitutes trade secret information and proprietary confidential business information.<sup>1</sup> To the best of the Company's knowledge, the information submitted in response to

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<sup>1</sup> Proprietary confidential business information means 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

the post-audit January 14 Questions has not been disclosed to the public.

7. VCI's responses to the post-audit January 14 Questions are attached as Exhibit A hereto, under seal, and highlighted pursuant to Commission rule. Exhibit B contains (2) two copies of the information contained in Exhibit A on which the confidential portions have been redacted pursuant to Commission rule.

8. For all of the reasons set forth above, the Company respectfully requests that this material be treated as confidential pursuant to § 364.183(1) F.S. and Rule 25-22.006(5).

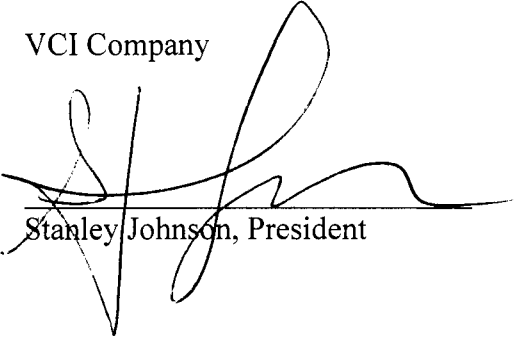
[Signature Next Page]

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administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business 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 concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods and services on favorable terms; (e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. (§364.183(3) F.S).

Respectfully submitted this 16<sup>th</sup> day of January 2008.

VCI Company

A handwritten signature in black ink, appearing to read 'Stanley Johnson', written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke.

Stanley Johnson, President

STATE OF FLORIDA

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



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ANN COLE  
COMMISSION CLERK  
(850) 413-6770

**CONFIDENTIAL**

**Public Service Commission**

**ACKNOWLEDGEMENT**

DATE: January 16, 2008

TO: Beth Keating/Akerman Law Firm

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 080000-0T or, if filed in an undocketed matter, concerning certain documents submitted in response to post-audit questions, and filed on behalf of VCI Company D/B/A Vilaire Communications. 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.

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