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November 28, 2005

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 041269-TP

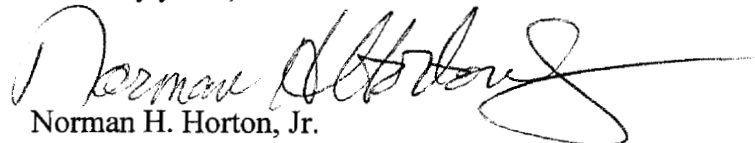
Dear Ms. Bayó:

Enclosed for filing on behalf of NuVox Communications, Inc. is an original and fifteen copies of NuVox Communications, Inc.'s Request for Specified Confidential Classification in the above referenced docket.

Please acknowledge receipt of this document by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,


Norman H. Horton, Jr.

NHH/amb
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

DOCKET NO. 041269-TP

Filed: November 28, 2005

**NUVOX COMMUNICATIONS, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

NuVox Communications, Inc. ("NuVox") pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Specified Confidential Classification.

1. On September 26, 2005, BellSouth served its First Set of Interrogatories on NuVox consisting of 3 requests. On October 17, 2005, NuVox served its Objections and Responses and on October 25, 2005, NuVox served Objections and Supplements Responses.

2. The discovery served by BellSouth requested disclosure of information regarding wire centers and related arrangements which NuVox considers to be confidential and proprietary. NuVox accompanied both responses with a Claim of Confidentiality pursuant to Rule 25-22.006, Florida Administrative Code.

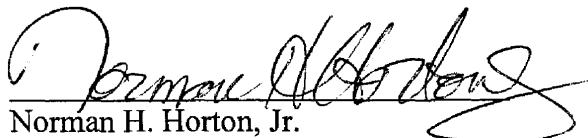
3. Section 364.183, Florida Statutes, provides an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure of confidential business information would "impair the competitive business of the provider of the information." Disclosure of the information as sought in the discovery would harm the competitive interests of NuVox by placing details of its business operations, specifically wire centers, in the public domain. Accordingly, the information should be exempt from the public disclosure requirements of section 119.07, Florida Statutes. NuVox considers and treats this information as

confidential and proprietary. A more specific description of the exhibit information is contained in Attachment A.

4. Because the responses provided by NuVox include discussions and explanations as well as identification of locations, NuVox considers the entire response to be confidential and proprietary. Disclosure of the explanations would reveal arrangements NuVox may have and such disclosure would be harmful to the competitive interests of NuVox.

WHEREFORE, based on the foregoing, NuVox moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 28th day of November, 2005.



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Attorneys for NuVox Communications, Inc.

ATTACHMENT "A"

DOCKET NO. 041269-TP

<u>Document</u>	<u>Request and Page No.</u>	<u>Lines</u>	<u>Reason</u>
Response to BellSouth's First Set of Interrogatories	1, page 2	Entire Response	The copies contain CONFIDENTIAL Information regarding the location of wire centers and arrangements for NuVox. This information is related to the ongoing business affairs and operations of NuVox and can be used by competitors to harm competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the Providers of the information." Therefore, the information should be shielded from disclosure Pursuant to section 119.07, Florida Statutes, and section 24(a), Art. 1 of the State Constitution.
	2, page 3	Entire Response	
	3, pages 3 and 4	Entire Response	
Supplemental Responses to BellSouth's First Set of Interrogatories	1, page 2	Entire Response	
	2, page 3	Entire Response	
	3, page 4	Entire Response	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

DOCKET NO. 041269-TP

NUVOX'S OBJECTIONS AND RESPONSES TO BELL SOUTH'S FIRST SET OF INTERROGATORIES (NOS. 1 - 3)

NuVox Communications Inc. ("NuVox") hereby provides a partial response to BellSouth's First Set of Interrogatories to NuVox. As agreed to telephonically by counsel for BellSouth, NuVox herein provides responses to the interrogatories with respect to the State of Georgia only. NuVox will provide the information for the other requested states by October 24, 2005. The answers to these interrogatories were provided by Susan J. Berlin, Vice President, Senior Regulatory Counsel of NuVox.

OBJECTIONS

1. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege or to the extent it requires disclosure of proprietary confidential business information exempt from disclosure pursuant to Section 364.183, Florida Statutes.
2. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
3. NuVox object to each and every Interrogatory to the extent that it is vague, overly broad, or contains undefined terms susceptible to multiple meanings.

4. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is a matter of public record, for example, documents that have been filed with a government agency.
5. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is not in the possession, custody, or control of the NuVox.
6. NuVox object to each and every Interrogatory to the extent that it seeks information for an indeterminate period of time and is thus overly broad and unduly burdensome. NuVox will provide non-privileged information that is responsive to the issue to which the Interrogatory responds.
7. NuVox object to each and every Interrogatory to the extent that it imposes a burden of discovery not required in the Rules of Civil Procedure.
8. NuVox object to each and every Interrogatory to the extent that it is unduly burdensome, expensive, or oppressive to respond to as presently written, particularly where an Interrogatory seeks information regarding “all” instances or examples.
9. NuVox subsequent responses to Interrogatories shall not be deemed an admission as to the relevance or materiality of any of the information sought therein. As discovery is ongoing in this matter, NuVox reserve the right to supplement and update these responses.

INTERROGATORIES AND RESPONSES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein NuVox is a fiber-based collocater that were not previously listed in BellSouth’s First Request for Admissions served upon NuVox in North Carolina. If you have previously furnished this information, on an informal basis, it is not necessary to duplicate that response.

Response:



2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which NuVox has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not NuVox considers such arrangements to qualify as “fiber-based collocation” pursuant to the FCC’s definition. Please describe with specificity the manner in which NuVox obtains fiber. If NuVox contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which NuVox has an active collocation arrangement(s) and obtains access to transport facilities from another entity that is not BellSouth, whether or not NuVox considers such facilities to qualify as “comparable transmission facilities” pursuant to the FCC’s definition. Please describe with specificity the manner in which NuVox obtains such facilities or transport and the quantity and bandwidth/capacity of such facilities, both activated and not currently activated. If NuVox contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted this 18th day of October, 2005.

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Attorneys for NuVox Communications, Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc.

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NUVOX'S OBJECTIONS AND SUPPLEMENTAL RESPONSES TO BELLSOUTH'S FIRST SET OF INTERROGATORIES (NOS. 1 - 3)

NuVox Communications Inc. ("NuVox") hereby provides supplemental responses to BellSouth's First Set of Interrogatories to NuVox. The supplemental answers to these interrogatories were provided by Susan J. Berlin, Vice President, Senior Regulatory Counsel of NuVox.

OBJECTIONS

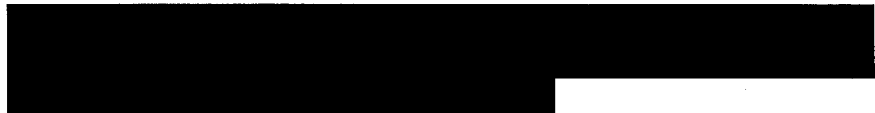
1. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is protected from disclosure by the attorney work product privilege, attorney-client communication privilege, or other applicable privilege or to the extent it requires disclosure of proprietary confidential business information exempt from disclosure pursuant to Section 364.183, Florida Statutes.
2. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
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5. NuVox object to each and every Interrogatory to the extent that it seeks production of information that is not in the possession, custody, or control of the NuVox.
6. NuVox object to each and every Interrogatory to the extent that it seeks information for an indeterminate period of time and is thus overly broad and unduly burdensome. NuVox will provide non-privileged information that is responsive to the issue to which the Interrogatory responds.
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9. NuVox subsequent responses to Interrogatories shall not be deemed an admission as to the relevance or materiality of any of the information sought therein. As discovery is ongoing in this matter, NuVox reserve the right to supplement and update these responses.

INTERROGATORIES AND RESPONSES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein NuVox is a fiber-based collocator that were not previously listed in BellSouth’s First Request for Admissions served upon NuVox in North Carolina. If you have previously furnished this information, on an informal basis, it is not necessary to duplicate that response.

Supplemental Response:



2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which NuVox has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not NuVox considers such arrangements to

qualify as “fiber-based collocation” pursuant to the FCC’s definition. Please describe with specificity the manner in which NuVox obtains fiber. If NuVox contends that it is not a fiber based collocater in any such wire center, please explain with specificity the basis for this contention.

Supplemental Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which NuVox has an active collocation arrangement(s) and obtains access to transport facilities from another entity that is not BellSouth, whether or not NuVox considers such facilities to qualify as “comparable transmission facilities” pursuant to the FCC’s definition. Please describe with specificity the manner in which NuVox obtains such facilities or transport and the quantity and bandwidth/capacity of such facilities, both activated and not currently activated. If NuVox contends that it is not a fiber based collocater in any such wire center, please explain with specificity the basis for this contention.

Supplemental Response:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted this 25th day of October, 2005.

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Attorneys for NuVox Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by electronic mail and U. S. Mail this 28th day of November, 2005.

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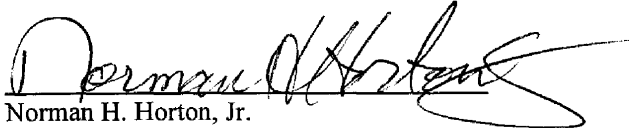
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