

WIGGINS & VILLACORTA, P.A.

ATTORNEYS AT LAW

POST OFFICE DRAWER 1657
TALLAHASSEE, FLORIDA 32302

2145 DELTA BOULEVARD, SUITE 200
TALLAHASSEE, FLORIDA 32303

TELEPHONE (850) 385-6007
FACSIMILE (850) 385-6008
INTERNET: wiggvill@nettally.com

March 3, 2000

Ms. Blanco S. Bayo
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Claim of Confidentiality
Audit Control No. 99-077-41
1996 Flow Through Access Charge

Dear Ms. Bayo:

In response to discussions with PSC Staff, Division of Auditing and Financial Analysis, this letter will clarify our claim of confidentiality dated February 21, 2000, filed on behalf of Telco Holdings Inc. d/b/a Dial and Save ("D&S"), an affiliate of Excel Telecommunications, Inc., pursuant to Section 364.183(1), Florida Statutes and Rule 25-22.006(5), Florida Administrative Code.

Workpapers

The materials contain telephone numbers and call data of D&S customers obtained by the Commission auditors. Customer information of this sort has long been classified at both the federal and state level as proprietary and private to the ratepayer and should not be disclosed to the public. This information also consists of customer lists, and as such constitutes bona fide proprietary confidential business information of D&S. This confidential information is contained in WP 1, WP 5-7, WP 10-2, WP 10-3, WP 41, WP 41-A, WP 41-B, WP 41-C, WP 41-1, WP 41-1/1, WP 41-1/2, WP 41-1/3, WP 41-1/4, WP 41-1/5, WP 41-1/6, WP 41-1/7, WP 41-1/8, WP 41-1/9, WP 41-1/10, WP 41-1/11, WP 41-1/12, WP 41-1/12-1.

WP 53-3 consists of access charges paid on a per LATA basis to named local exchange carriers. WP 53-8 consists of an Income Statement by various expense and product categories. Both workpapers would, if made public, disclose information concerning the Company's market penetration and level of marketing-related expense for presubscribed and Dial Around product lines. As

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This claim of confidentiality was filed by or on behalf of a telecommunications company for Confidential Document No. 02854-00. The document has been placed in locked storage pending staff advice on handling. Your name must be on the CASR to access the material. If it is undocketed, your division director must obtain written permission from the EXD/Tech before you can access it.

(x-ref 01437-00)

DOCUMENT NUMBER-DATE

02855 MAR-38

FPSC-RECORDS/REPORTING

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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CLAIM
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FPSC-RECORDS/REPORTING

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such, this information is trade secret in nature and should also be afforded protection from public disclosure.

WP 53-6 and WP 53-7 contain the 1120 Federal Income Tax Returns for the auditee. As such, these documents clearly qualify for confidential classification.

We claim that the foregoing PSC Staff audit workpapers should be given confidential classification in their entirety. Inasmuch as the workpapers are already on file with the Commission, it is our understanding that a separate submittal of such workpapers redacted in their entirety is unnecessary.


Audit Report

Telephone numbers and call data of D&S customers are disclosed on pages 11 and 13 of the PSC Staff Audit Report. Customer information of this sort has long been classified at both the federal and state level as proprietary and private to the ratepayer and should not be disclosed to the public.

An original copy of said pages 11 and 13 with the confidential information highlighted thereon, and two (2) copies of said report with said confidential information redacted, are submitted herewith.

Please acknowledge receipt of this transmittal by returning a date-stamped copy of the enclosed duplicate in the return envelope provided for that purpose.

Very truly yours,



Wayne L. Schiefelbein

WLS:plk
Enclosures