

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition of BellSouth Telecommunications,
Inc. for Section 252(b) Arbitration of
Interconnection Agreement with Intermedia
Communications Inc.

Docket No. 991854-TP

Filed: May 3, 2000

INTERMEDIA COMMUNICATIONS INC.'S
REVISED REQUEST FOR CONFIDENTIAL CLASSIFICATION

Intermedia Communications Inc. ("Intermedia"), by its undersigned counsel, pursuant to Rule 25-22.006(8)(b), Florida Administrative Code, files this Revised Request for Confidential Classification ("Revised Request"), and in support thereof states as follows.

1. This Revised Request corrects an error in and is be substituted in its entirety for Intermedia's Request for Confidential Classification, which was filed with the Commission on May 2, 2000.
2. On March 6, 2000, Intermedia filed the rebuttal testimony of J. Carl Jackson, with a claim of confidentiality pursuant to Rule 25-22.006(5), Florida Administrative Code, for Composite Exhibit No. JCJ-3, attached thereto.
3. Composite Exhibit No. JCJ-3 consists of trunk topology diagrams of Intermedia's interconnection arrangements with BellSouth in Orlando, Miami, Tampa, and Jacksonville.
4. On April 3, 2000, Intermedia served its Supplementary Response to Staff's First Request for Production of Documents, with a claim of confidentiality pursuant to Rule 25-22.006(5),

Florida Administrative Code.

5. The Supplementary Response consists of a map showing the geographic areas in Florida served by Intermedia's switches, overlaid with the geographic areas served by BellSouth tandem switches.

This confidentiality request was filed by or for a "telco" for DN 02915-00 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.

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6. On April 7, 2000, Intermedia served certain proprietary documents as part of its Response to Staff's First Request for Production of Documents, with a claim of confidentiality pursuant to Rule 25-22.006(5), Florida Administrative Code. These documents were produced originally to staff in partial response on March 22, 2000, but only in redacted form.

7. These certain proprietary documents consist of maps of Intermedia's current and future rate centers in Orlando, Miami, Tampa, and Jacksonville.

8. All of the above-mentioned materials were introduced into the evidentiary hearing in this proceeding on April 10, 2000.

9. All of the above-mentioned materials describe Intermedia's telecommunications network deployment in Florida. As such, they are proprietary confidential business information as defined in Section 364.183(3), Florida Statutes, particularly "trade secrets" as identified in subpart (a) and "information related to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" as identified in subpart (e).

10. All of the above-mentioned materials are owned and controlled by Intermedia. They are valuable. They are intended to be and are treated by Intermedia as private in that the disclosure of the information to competitors would cause harm to Intermedia's business operations. They have not been publicly disclosed.

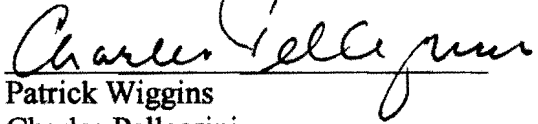
11. Accordingly, all of these materials should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes, and held to be exempt from the public disclosure requirements of Section 119.07(1), Florida Statutes.

12. The original of this Request was filed today with the Division of Records and Reporting, and a copy was served on BellSouth on the day following.

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

Respectfully submitted,

INTERMEDIA COMMUNICATIONS INC.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by hand delivery* or Federal Express, overnight delivery** this 3rd day of May, 2000, to the following:

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