#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Request for arbitration concerning ) Complaint of IDS Telcom, LLC against BellSouth ) Telecommunications, Inc., regarding breach of ) interconnection agreement ) Docket No. 010740-TP

#### IDS TELCOM'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

Comes now, IDS Long Distance, Inc. n/k/a IDS Telcom, LLC ("IDS") and pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, files its Request for Specified Confidential Classification, and states the following:

1. IDS is filing a Request for Confidential Classification for certain portions of the deposition transcripts of William Gulas, Robert Hacker, Bradford Hamilton, Keith Kramer, Angel Leiro and Becky Wellman.

2. These deposition transcripts contain proprietary confidential business information pursuant to Section 364.183(3), Florida Statutes. Disclosure of the information would cause harm to IDS' business operations and would impair the competitive business of IDS. In addition, customer proprietary information which is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24. Accordingly, these transcript portions should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

3. IDS has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

4. Attachment A contains an index for each deposition transcript which outlines IDS' specific requests for confidentiality. Attachment B contains two copies each of the requested

This confidentiality request was filed by or for a "telco" for DN \_\_\_\_\_. 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. 11782-01 TO 11789-01(TL021764;1)

No. DOCUMENT NU FPSC-COMMISSION CLEON

documents with the confidential information deleted. Attachement C is a sealed box containing one highlighted copy each of the documents including those portions that are confidential.

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

Respectfully submitted this 25<sup>th</sup> day of September, 2001.

Bruce Culpepper

AKERMAN, SENVERFITT & EIDSON, P.A. 301 South Bronough Street, Suite 200 Post Office Box 10555 Tallahassee, Florida 32302-2555 Phone: (850) 222-3471 Fax: (850) 222-8628

John F. O'Sullivan Brian Miller Douglas O'Keefe **AKERMAN, SENTERFITT & EIDSON, P.A.** SunTrust International Center, 28th Floor One Southeast Third Avenue Miami, Florida 33131-1704 Phone: (305) 374-5600 Fax: (305) 374-5095

Suzanne Fannon Summerlin 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301 (850) 656-2288 Fax: (850) 656-5589

Attorneys for IDS Telcom, LLC

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished

via Hand Delivery this 25th day of September, 2001, to:

Mary Anne Helton Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

James Meza III, Esq. Nancy B. White, Esq. c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301

Attorney

### ATTACHMENT A

- Reason 1: Personal Information pursuant to 364.183(3)(f) Employee personnel information unrelated to compensation, duties, qualificiations, or responsibilities.
  Reason 2: Business Information pursuant to 364.183(3) Information owned or controlled by IDS, which is intended to be and is treated as private in that the disclosure of the information would cause harm to the ratepayers or IDS' business operations, and has not been disclosed to the public.
  Reason 3: Competitive Interest Information pursuant to 364.183(3)(e) Information relating
- Reason 3: Competitive Interest Information pursuant to 364.183(3)(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of IDS.
- Reason 4: Customer Information pursuant to 364.183 and 364.24.

Depostion	of	William	Gulas
-----------	----	---------	-------

Page	Line	Confidential Explanation
3	14, 16	j 1
31	22	2
38	17	2
39	23	2
54	4	2
57	24	2
58	23, 25	2
59	2, 4, 6, 8	2
59	24	3
60	2, 7, 8, 9, 10	3
61	4, 5, 6, 9, 17	3
62	1,5	2

## Deposition of Robert Hacker

Page	Line	Confidential Explanation
4	5,6	1
4	8	1
15	13	2
15	16	2
15	17	2
15	18	2
15	19	2 2 2 2 2 2 2 2 2
15	20	2
16	8	2
16	13	2
17	12	2 2
17	16	2
18	2	2
19	10	2 2 2
19	18	2
20	5	2
20	12	2
21	5	2
21	6	
25; 26	25; 1	2 3
26	23, 1	
27	23 5	3 3 3
27	19-20	3
28	19-20	3
31	24	2
31	25	2
33	3	3
33	5	3
33	14-15	3 3 2
34	11-13	
34	11	2
34	17	2
34	19	2
34	20-21	
35	1	2 2
35	4	
36; 37	_1	2 3
30, 37	22-25; 1 10	2
38	10	
<u> </u>		2
	3	2
64		2 2
64	9	2
64	13	2

Page	Line	Confidential Explanation
3	16, 17 & 19	1
15	3	2
21	9, 13, 14, 17,	2
	18, 21, 22, 23	
22	1	2
23	8, 19	2
24	5,7	2
27	23-24	2
39	9-10, 25	2
40	2, 11	2
41	1	2
94	17	2
95	12, 19, 21, 23	2
96	2-4	2
110	4, 5, 7, 19-20,	4
	22	
111	7,10	4
111	23-24	4
123	4	2
128	12-14	4
128	16	2
130	13, 18, 19	2
132	14	2
133	24	2
134	15, 21	2
135	12, 16, 17	2
136	17	2
137	2, 3, 20, 21,	2
	25	
138	2	2
151	7	2
155	18	2
161	5,6	2
161	6	2

# Deposition of Brad Hamilton

# Deposition of Keith Kramer

Page	Line	Confidential Explanation
3	17-18	1
3	20	2
15	24	2
16	3, 5, 6	2
19	3, 5, 12, 13, 19, 20	2
28	17, 18, 19	3
28	22-25	3
29	1, 2, 16	3
30	4, 5	3
31	7,12	3
32	14, 15, 19, 20	3
33	11,16	3
33	21-24	3
34	1,3	3
34	4-5	3
34	9, 13, 14, 16,	3
	17, 18, 25	
35	1, 2, 5	3
36	4, 9, 13, 17, 21, 23, 24	3
37	3, 11, 13, 14	3
38	3, 6, 13, 21, 23, 24	3
39	5,9	3
40	6	3
40	13-15	3
40	16, 17	3
41	17, 21, 22, 23, 24	3
46	16	3
48	9-10	3
48	11, 12, 17,	3
49	19, 21	3
49	22	2
50	1, 4, 6	2
57	22-25	3
58	1, 2, 3, 13	1
59	1	3
59	5	3

Page	Line	Confidential Explanation
59	6	3
60	8	3
66	9-10	2
66	15-17	2
66	23	2
67	2	2
67	14-15	2
67	21	2
68	7, 8, 15, 17, 23	2
69	4, 5, 9, 10, 20	2
70	1, 3, 4, 8, 11	2
70	12-13	2
70	17,20	2
70	23-25	2
71	1-2	2
71	4, 14, 23	2
71	24-25	2
72	1-9	2
72	10, 13, 14, 15, 18	2
72	19-25	2
73	1-18	2
73	20-25	2
74	1-15	2
74	18-25	2
75	1-18	2
75	20, 21	2
76	6-9	2
76	18	2
76	19-23	2
77	7, 10, 23	2 2
78	5, 8, 9, 12, 13, 18	2
78	21-25	2
79	1-25	2
80	1-25	2
81	1-25	2
82	1-2	2
83	14, 18	2
84	2-3	2
85	18, 21	3
86	4, 12, 20	3
91	5	3

Page	Line	Confidential Explanation
102	11	2
102	12-13	2
102	14, 17	2
102	18-25	2
103	1-12	2
112	20, 24	3
142	18	4
144	17, 21	4
145	7,8	4
331	4	3
354	13, 5, 21, 24	2
355	2, 4, 8, 10, 20, 24, 25	2
355	25	2
356	2, 3, 7, 8, 14, 16, 18, 22, 25	2
357	3, 16, 21, 23, 25	2
358	. 11	2
359	4	2
360	19, 22, 23	2
361	15, 17	2
365	8, 9, 19	2
366	5, 9, 22, 24, 25	2
367	2, 3, 7	2
371	20	3
389	18	3
390	8, 9, 15, 16, 18, 24	3
391	1, 3, 13	3
397	6, 7, 13, 17, 24, 25	3
398	1	3
399	14, 18	3
405	2, 8	3
408	22	4
410	8	4
418	24, 25	4
419	14, 19, 20, 23	4
420	3	4
442	19, 20	4

# **Deposition of Angel Leiro**

Page	Line	Confidential Explanation
27	5	4
40	4	4
40	5	4
52	22	3

Page	Line	Confidential Explanation
4	5, 6, 8	1
15	24-25	2
16	1, 15	2
16	18-20	2
16	23-25	2
17	11-12	3
17	14-16	3
18	4-5	3
22	23, 24, 25	3
23	12	3
24	1	3
41	10-18	3
41	22-23	3
42	10	3
43	22	3
66	4	3

.

## Deposition of Becky Wellman

### ATTACHMENT B

IDS Telcom, LLC FPSC Docket No. 010740-TP

### • DEPOSITION TRANSCRIPTS OF:

WILLIAM GULAS ROBERT HACKER BRADFORD HAMILTON KEITH KRAMER ANGEL LEIRO REBECCA WELLMAN

### TWO REDACTED COPIES EACH FOR PUBLIC DISCLOSURE

### ATTACHMENT C

### IDS Telcom, LLC FPSC Docket No. 010740-TP

### • DEPOSITION TRANSCRIPTS OF:

WILLIAM GULAS ROBERT HACKER BRADFORD HAMILTON KEITH KRAMER ANGEL LEIRO REBECCA WELLMAN

### **CONFIDENTIAL & PROPRIETARY**