

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.

DOCKET NO. 030867-TL

In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.

DOCKET NO. 030868-TL

In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.

DOCKET NO. 030869-TL

In re: Flow-through of LEC switched access reductions by IXC's, pursuant to Section 364.163(2), Florida Statutes.

DOCKET NO. 030961-TI

Served: December 5, 2003

**KNOLOGY OF FLORIDA, INC.'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, Knology of Florida, Inc. ("Knology"), pursuant to Rule 22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files this Request for Specified Confidential Classification.

1. On December 4, 2003, Knology served its Responses to Staff's Second Set of Interrogatories of which Interrogatory Nos. 11 and 17 contain proprietary confidential business information.

2. Knology hereby files this Request for Specified Confidential Classification because the information contained in Knology's responses to Staff's interrogatories include confidential business information utilized by Knology to conduct business. A more specific

DOCUMENT NUMBER: 0411

12490 DEC-5 8

FPSC-COMMISSION CLERK

description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to Knology and provide competitors with an unfair advantage. The information discussed in this Request for Confidential Classification is valuable and Knology strives to keep it secret. Therefore, such information should be classified as confidential, proprietary business information pursuant to Section 364.214 and Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 199.07, Florida Statutes.

3. Attachment A to Knology's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by Knology as confidential.

4. Attachment B to Knology's Request for Confidential Classification is redacted copies of the document containing the confidential information.

5. Attachment C to Knology's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

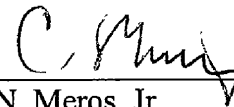
6. The information discussed in this Request for Confidential Classification is valuable, Knology treats this information as confidential in all requests, and this information has not been generally disclosed.

7. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the parties.

WHEREFORE, based on the foregoing, Knology respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 5th day of December, 2003.

Respectfully submitted,



George N. Meros, Jr.
Florida Bar No.: 0263321
Carlos Muniz
GRAYROBINSON, P.A.
Post Office Box 11189
Tallahassee, Florida 32302-3189
Telephone: 850-577-9090
Telecopier: 850-577-3311

Attorneys for Knology of Florida, Inc.

Request for Confidential Classification of Knology of Florida, Inc.'s Responses to Staff's
Second Set of Interrogatories in FPSC Dockets 0303867-TL, 030868-TL, and 030869-TL.

Explanation of Proprietary Information

1. This information contains certain facts regarding Knology's current operating position. The public disclosure of this information would provide Knology's competitors with an advantage in that they would know average combined revenue per customer for one of its products along with the profitability of that product. Knology is not able to obtain its competitors' revenue per customer and profitability information. Therefore, it would be inequitable and unfair for Knology's competitors to have access to Knology's information. For these reasons, the public disclosure of information would impair the competitive businesses of Knology, and the information is, therefore, entitled to confidential classification under the terms of Florida Statutes, Section 364.183(3)(e). This information is valuable and is used by Knology in conducting its business and Knology strives to keep it secret. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183 Florida Statutes and is exempt for the Open Records Act.

<u>LOCATION</u>	<u>REASON</u>
Interrogatory No. 11	1
Interrogatory No.17	1

ATTACHMENT B
Knology of Florida, Inc.
Request for Confidential Classification
Page 1
12/5/03

Request for Confidential Classification of Knology of Florida, Inc.'s Responses to Staff's
Second Set of Interrogatories in FPSC Dockets 0303867-TL, 030868-TL, and 030869-TL.

TWO REDACTED COPIES

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.

DOCKET NO. 030867-TL

In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.

DOCKET NO. 030868-TL

In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.

DOCKET NO. 030869-TL

In re: Flow-through of LEC switched access reductions by IXCs, pursuant to Section 364.163(2), Florida Statutes.

DOCKET NO. 030961-TI

Served: December 5, 2003

**KNOLGY OF FLORIDA, INC.'S RESPONSES
TO STAFF'S SECOND SET OF INTERROGATORIES**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, Knology of Florida, Inc., by and through undersigned counsel, hereby answers Staff's Second Set of Interrogatories (Nos. 10-17) as set forth below.

INTERROGATORIES:

10. What is your average revenue per customer in Florida for the following services:

- A. Basic local service
- B. Vertical features
- C. IntraLATA toll
- D. InterLATA toll (intrastate) toll

- E. Extended calling plans
- F. Average combined revenue (if not providing all services set forth in A-E above, please identify which are included in this number)

If you have not yet begun to offer or provide service in Florida, please provide your anticipated average revenue per customer for basic service and for total service (excluding interstate long distance).

RESPONSE: Knology primarily markets its services to residential consumers. For more information please see response to Question 11.

11. What is your average revenue per residential customer in Florida for:

- A. Basic local service
- B. Vertical features
- C. IntraLATA toll
- D. InterLATA toll (intrastate) toll
- E. Extended Calling Plans
- F. Average combined revenue (if not providing all services set forth in A-E above, please identify which are included in this number)

If you have not yet begun to offer or provide service in Florida, please provide your anticipated average revenue per customer for basic service and for total service (excluding interstate long distance).

RESPONSE: [REDACTED]

12. What local services are you providing (or do you anticipate providing) to Florida customers?

RESPONSE: Knology currently offers flat rate local services in the state of Florida along with a wide variety of advanced calling features.

13. How are the services marketed (e.g., alone, only available as part of a bundle, etc.)?

RESPONSE: Primarily Knology markets its voice services bundled with its other broadband services. Knology does, however, offer all of its broadband services, including voice, ala Carte.

14. If the services are only available as part of bundle, what are the other services included in the bundle (e.g., long distance, wireless, high-speed Internet, cable television)?

RESPONSE: As mentioned in response to Question 13, consumers can purchase Knology's broadband services separately or in bundles. Consumers can bundle any combination of local telephone service, long distance telephone service, high-speed Internet access and cable television.

15. What is the minimum margin (average revenue less average cost) that is needed from a single line business customer in order to provide local service? If it is possible to separate out basic, vertical, and toll features, please do so. If it is possible to only provide a total number, explain what is included in that number.

RESPONSE: Knology does not base market entry on business telephone customers. For more information, please see response to Question 16.

16. What is the minimum margin (average revenue less average cost) that your company believes is necessary from a residential customer in order to provide local service? If it is possible to separate out basic, vertical, and toll features, please do so. If it is possible to only provide a total number, explain what is included in that number.

RESPONSE: As a bundled broadband service provider, Knology bases its market entry decisions on a number of factors. One important factor is the residential local telephone service rate of the incumbent LEC. In the Panama City, Florida market the incumbent LEC offers residential local telephone service for \$9.12 per month. When compared to the other four states that Knology currently offers its broadband services in, the average price for residential local telephone service offered by the incumbent LEC is \$15.02 per month. This disparity has played a large role in Knology's market analysis.

17. Is your local service offering (please explain what services it includes) profitable in Florida?

RESPONSE: [REDACTED]

Dated: December 4, 2003

Knology of Florida, Inc.

By: *Felix L. Boccucci*
(TITLE) *Vice President*

State of Georgia

County of Troup

Before me, the undersigned authority, personally appeared Felix L. Boccucci as VP, Business Dev. (title) of Knology of Florida, Inc. (to me known; () who provided the following identification _____, and, upon being duly sworn, stated that the foregoing answers to interrogatories number 10 through 17 were true and correct.

Shirley B. Niles
Notary Public

My Commission expires: MY COMMISSION EXPIRES JUNE 10, 2005.

ATTACHMENT B
Knology of Florida, Inc.
Request for Confidential Classification
Page 1
12/5/03

Request for Confidential Classification of Knology of Florida, Inc.'s Responses to Staff's
Second Set of Interrogatories in FPSC Dockets 0303867-TL, 030868-TL, and 030869-TL.

ONE HIGHLIGHTED CONFIDENTIAL COPY