

ORIGINAL



Tracy Hatch
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850-425-6360

March 19, 2004

BY HAND DELIVERY

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

RECEIVED - FPSC
MAR 19 PM 4:41
COMMISSION
CLERK

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing are an original and 15 copies of AT&T Communications of the Southern States, LLC's Requests for Confidential Treatment in the above-referenced docket.

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

Thank you for your assistance with this filing.

Sincerely yours,

Tracy Hatch
Tracy W. Hatch

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.

(view CMS for DNs)

TWH/las
Enclosure
cc: Parties of Record

- AUS _____
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conf records

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DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE
03769 MAR 19 03770 MAR 19
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE Review: Local Circuit Switching)
for Mass Market Customers) Filed: March 19, 2004

AT&T'S REQUEST FOR CONFIDENTIAL TREATMENT

AT&T Communications of the Southern States, LLC ("AT&T"), pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential treatment of certain data previously filed in these dockets pursuant to a claim for confidentiality. In support of this request, AT&T hereby states:

1. Pursuant to the procedure established by this Commission in this docket, AT&T provided responses to discovery propounded by BellSouth and the Commission Staff for presentation at the hearing which began on February 24, 2004, and which ended on February 27, 2004. Portions of those discovery responses included information considered to be and treated as proprietary and confidential. At the time of each filing (see dates listed in Attachments A and B), AT&T filed the appropriate corresponding claims for confidentiality as to those portions of its discovery responses pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. During the scheduled hearings, the discovery responses that were admitted into the record contain the information subject to AT&T's original claims for confidentiality. Pursuant to Rule 25-22.006(8)(b), Florida Administrative Code, AT&T requests that the Commission grant confidential treatment to the information contained in AT&T's discovery responses to BellSouth and Staff as listed in Attachments A and B,

respectively. The confidential and redacted copies required by Rule 25-22.006(4) are not being filed at this time as they were filed with the original claims filed.

3. All of the information for which confidential treatment is now being requested is considered to be trade secret and proprietary, confidential business information which, if disclosed, would be of benefit to competitors and cause harm to the company and its customers. Such information provides AT&T an economic benefit, and is not known to or readily ascertainable by other persons or parties. Such information is economically valuable to AT&T and its competitors, and AT&T treats such information as confidential and the company utilizes many processes and procedures to maintain its secrecy.

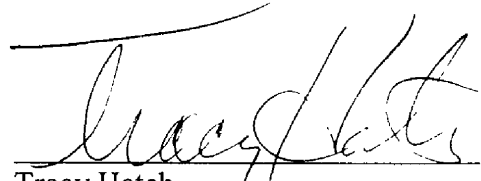
4. A trade secret is defined in Section 688.002(4), Florida Statutes, the Uniform Trade Secrets Act, to mean:

. . . Information, including a formula, patten, compilation, program, devise, method, technique, or process that:

- (a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and
- (b) Is the subject to efforts that are reasonable under the circumstances to maintain its secrecy.

The information at issue fits plainly in this definition as set forth above. Accordingly, the Commission should grant the request for confidential treatment and find the information on identified above to be confidential and exempt from Section 119.071(1), Florida Statutes, pursuant to Section 364.183(3)(a).

RESPECTFULLY SUBMITTED the 19th day of March 2004.

A handwritten signature in black ink, appearing to read "Tracy Hatch", written over a horizontal line.

Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, FL 32301
(850) 425-6360

ATTACHMENT A

**Confidential Discovery Responses to BellSouth
Docket 030851-TP**

Confidential Responses to Discovery	Date Filed
Responses to BellSouth's First Set of Interrogatories: Interrogatory No. 5 – Page 5, Lines 14-22 Interrogatory No. 6 -- Attachments 6a, 6b, 6c (entire document for each) Interrogatory No. 11 -- Attachment 11 (entire document) Interrogatory No. 12 – Page 14, Lines 12-16 Interrogatory No. 13 -- Attachment 13 (entire document) Interrogatory No. 14 – Page 16, Lines 35-41 Interrogatory No. 33 – Page 37, Lines 14-32; Page 38, Line 1	November 4, 2003
Supplemental Responses to BellSouth First Set of Interrogatories: Interrogatory No. 6 -- Revised Attachment 6c(entire document) Interrogatory No. 12 -- Revised Attachment 12 (entire document) Interrogatory No. 25 -- Attachment 25 (entire document), Page 14, Lines 11-12 Interrogatory No. 26 -- Attachment 26 (entire document), Page 15, Lines 15-16 Interrogatory No. 27 – Page 16, Lines 10-12 Interrogatory No. 30 – Page 19, Lines 12-15 Interrogatory No. 31 – Page 20, Lines 15-17 Interrogatory No. 43 – Page 27, Lines 23-29 Interrogatory No. 44 – Page 28, Lines 23-27	November 25, 2003
Responses to BellSouth Third Set of Interrogatories: Interrogatory No. 122 -- Attachment 122 (entire document)	December 9, 2003
2 nd Supplemental Responses to BellSouth First Set of Interrogatories: Interrogatory No. 25 -- Revised Attachment 25 (entire document)	December 10, 2003
3 rd Supplemental Responses to BellSouth First Set of Interrogatories: Interrogatory No. 5 -- Revised Attachment 5b (entire document)	January 20, 2004

Confidential Responses to Discovery	Date Filed
Responses to BellSouth Fifth Set of Interrogatories: Interrogatory No. 180 – Attachment 180 (entire document) Interrogatory No. 181 – Attachment 181 (entire document)	January 22, 2004
Response to BellSouth Seventh Set of Interrogatories: Interrogatory No. 242 -- Attachment 242 (entire document)	February 12, 2004
Supplemental Responses to BellSouth Sixth Set of Interrogatories: Interrogatory No. 193 – Page 5, Line 17 Interrogatory No. 218 – Page 14, Lines 7-11	February 20, 2004

Attachment B

**Confidential Discovery Responses to Staff
Docket No. 030851-TP**

Responses to Discovery	Date Filed
Responses to Staff TRO Data Request: Page 3, Lines 22-32 Attachments 2, 3, 4, 5, 6, 7 (entire document for each)	December 3, 2003
Responses to Staff First Set of Interrogatories: Interrogatory No. 4 -- Attachment 4a (entire document)	December 12, 2003
Responses to Staff Second Set of Interrogatories: Interrogatory Nos. 8(a) & (d) -- Attachment 1 (entire document) Interrogatory No. 8(i) -- Page 8, Lines 11-25 Interrogatory No. 8(u) -- Attachment 2 (entire document)	December 31, 2003
Supplemental Responses to Staff Second Set of Interrogatories: Interrogatory No. 8(a) -- Revised Attachment 1 (entire document)	January 20, 2004
Responses to Staff Fifth Set of Interrogatories: Interrogatory No. 27 (f) -- Page 4, Columns 3, 4, 5 of Table, and Attachment (entire document) Interrogatory No. 27 (g) -- Page 5, Columns 3, 4, 5 of Table; Page 6, lines 2, 3 Interrogatory No. 29(a) -- Attachment (entire document) Interrogatory No. 29 (j) -- Page 10, Line 12 Interrogatory No. 29(k) -- Table (entire Table)	February 18, 2004

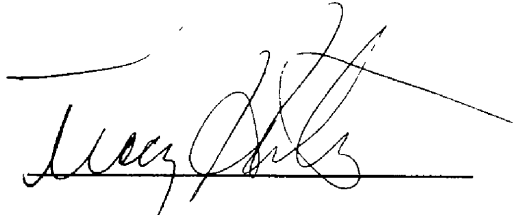
**CERTIFICATE OF SERVICE
DOCKET NO. 030851-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail and U.S. Mail or as indicated this 19th day of March 2004, to the following parties of record:

<p>Jeremy Susac Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850</p>	<p>BellSouth Telecommunications, Inc. * Nancy B. White c/o Ms. Nancy H. Sims 150 South Monroe Street, Suite 400 Tallahassee, FL 32301-1556 Phone: (850) 224-7798 Fax: 222-8640 Email: nancy.sims@bellsouth.com</p>
<p>Florida Cable Telecom. Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303 Phone: 850-681-1990 Fax: 681-9676 Email: mgross@fcta.com</p>	<p>MCI WorldCom Communications, Inc. * Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Phone: (850) 219-1008 Fax: 219-1018 Email: donna.mculty@wcom.com</p>
<p>Sprint – Florida* Susan S.Masterton 1313 Blairstone Road MC: FLTLHO0107 Tallahassee, FL 32301 Phone: (850) 847-0244 Fax: 878-0777 Email: susan.masterton@mail.sprint.com</p>	<p>KMC Telecom III, LLC * Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119 Phone: (678) 985-6261 Fax: (678) 985-6213 Email: marva.johnson@kmctelecom.com</p>
<p>Covad Communications Company* Charles E. Watkins 1230 Peachtree Street, NE 19th Floor Atlanta, GA 30309 Phone: (404) 942-3492 Email: gwatkins@covad.com</p>	<p>ITC^DeltaCom * Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802 Phone: (256) 382-3856</p>
<p>McWhirter Reeves McGlothlin Davidson* Kaufman & Arnold, PA Vicki Gordon Kaufman 117 South Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Email: vkaufman@mac-law.com</p>	<p>Verizon Florida Inc.* Mr. Richard Chapkis/Kim Caswell 201 N. Franklin Street, MCFLTC0007 Tampa, FL 33601 Phone: (813) 483-2606 Fax: (813) 204-8870 Email: richard.chapkis@verizon.com</p>
<p>Allegiance Telecom of Florida, Inc. Charles V. Gerkin, Jr. 9201 North Central Expressway Dallas, TX 75231 Phone: (469) 259-4051 Fax: 770-234-5965 Email: charles.gerkin@algx.com</p>	<p>Allegiance Telecom, Inc. Terry Larkin 700 East betterfield Road Lombard, IL 60148 Phone: 630-522-6453 Email: terry.larkin@algx.com</p>

<p>Messer Law Firm * Floyd Self/Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876 Phone: 850-222-0720 Fax: 850-224-4359</p>	<p>MCI WorldCom Communications, Inc.(GA)* De O'Roark, Esq. Six Concourse Parkway, Suite 600 Atlanta, GA 30328 Email: de.oroark@wcom.com</p>
<p>Granite Telecommunications, LLC Rand Currier/Geoff Cookman 234 Copeland Street Quincy, MA 02169-4005 Phone: (617) 847-1500 Fax: (617) 847-0931 Email: rcurrier@granitenet.com</p>	<p>Miller Isar, Inc. Andrew O. Isar 7901 Skansie Avenue, St. 240 Gig Harbor, WA 98335 Phone: (253) 851-6700 Fax: (253) 851-6474 Email: aisar@millerisar.com</p>
<p>Moyle Law Firm (Tall) Jon Moyle, Jr. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: 681-8788 Email: jmoylejr@moylelaw.com</p>	<p>NewSouth Communications Corp.* Jake E. Jennings/Keiki Hendrix Two North Main Center Greenville, SC 29601-2719 Phone: (864) 672-5877 Fax: (864) 672-5313 Email: jejennings@newsouth.com</p>
<p>BellSouth Telecommunications, Inc.* R. Douglas Lackey 675 W. Peachtree Street, Suite 4300 Atlanta, GA 30375 Phone: (404) 335-0747</p>	<p>Supra Telecommunications and Info. Systems Jorge Cruz-Bustillo 2620 S.W. 27th Avenue Miami, FL 33133 Phone: (305) 476-4252 Fax: (305) 443-1078 Email: Jorge.cruz-bustillo@stis.com</p>
<p>Supra Telecommunications and Info. Systems Jonathan Audu 1311 Executive Center Drive, Suite 220 Tallahassee, FL 32301-5027 Phone: (850) 402-0510 Fax: (850) 402-0522 Email: Jonathan.audu@stis.com</p>	<p>Sprint (KS) Kenneth A. Schifman 6450 Sprint Parkway Mailstop: KSOPHN0212-2A303 Overland Park, KS 66251-6100 Phone: 913-315-9783</p>
<p>Sprint (NC) H. Edward Phillips, III 14111 Capital Blvd. Mailstop: NCWKFR0313-3161 Wake Forest, NC 27587-5900 Phone: 919-554-7870</p>	<p>Xspedius Communications Ms. Rabinai E. Carson 5555 Winghaven Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220 Fax: (301) 361-4277 Email: rabinai.carson@xspedius.com</p>
<p>Matthew Feil FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801 (407) 835-0460 Email: mfeil@mail.fdn.com</p>	<p>Scott A. Kassman FDN Communications 390 North Orange Avenue Suite 2000 Orlando, FL 32801 (407) 447-6636 Email: skassman@mail.fdn.com</p>

<p>Charles J. Beck Deputy Public Counsel Office of Public Counsel C/O The Florida Legislature 111 West Madison Street, #812 Tallahassee, FL 32399-1400 Phone: 850-487-8240 Fax: 850-488-4491 Beck.charles@leg.state.fl.us</p>	<p>Casey & Gentz, L.L.P. Bill Magness 919 Congress Avenue, Suite 1060 Austin, TX 78701 Phone: 512-225-0019 Fax: 512-480-9200</p>
<p>Pat Lee Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 plee@psc.state.fl.us</p>	



Tracy W. Hatch