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March 24, 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

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MAR 24 AM 11:17
COMMISSION
CLERK

Re: Docket No. 030852-TP

Dear Ms. Bayó:

Enclosed for filing are an original and fifteen copies of AT&T'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 return to Lisa Sapper in the enclosed envelop at the time of filing.

Thank you for your assistance.

Sincerely yours,

Tracy Hatch/las
Tracy W. Hatch

RECEIVED & FILED

[Signature]
FPSC-BUREAU OF RECORDS

TWH/las
Enclosure
cc: Parties of Record

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL
- OPC _____
- MMS _____
- SEC
- OTH

conf records

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.

00923-04 (Rebuttal)

DOCUMENT NUMBER-DATE
03870 MAR 24 03
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 030852-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via electronic mail or as indicated this 24th day of March, 2004 to the following parties of record:

<p>Adam Teitzman Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Email: ateitzma@psc.state.fl.us</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: ykaufman@mac-law.com</p>	<p>Verizon Florida Inc. * Mr. Richard Chapkis 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>FDN Communications</p>	<p>Florida Competitive Carriers Assoc. C/O McWhirter Law Firm</p>

<p>Matthew Feil/Scott Kassman 390 North Orange Avenue, Suite 2000 Orlando, FL 32801-1640 Phone: (407) 835-0460 Fax: (407) 835-0309 Email: mfeil@mail.fdn.com/skassman@mail.fdn.com</p>	<p>Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301 Phone: (850) 222-2525 Fax: (850) 222-5606 email: jmcglothlin@mac-law.com/vkaufman@mac-law.com</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>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>Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. Jon C. 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 Two North Main Center Greenville, SC 29601-2719 Phone: (864) 672-5877 Fax: (864) 672-5313 Email: jejennings@newsouth.com</p>
<p>Xspedius Communications Ms. Rabinai E. Carson 5555 Wingham Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220 Fax: (301) 361-4277 Email: rabinai.carson@xspedius.com</p>	<p>BellSouth Telecommunications, Inc.* Douglas Lackey 675 W. Peachtree Street, Suite 4300 Atlanta, GA 30375</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 Jonathan.audu@stis.com</p>
<p>Nuvox Communications, Inc. Bo Russell 301 North Main Street Greenville, SC 29601</p>	<p>Miller Isar, Inc. Andrew O. Isar 7901 Skansie Avenue, Ste. 240 Gig Harbor, WA 98335</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>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>	

Tracy Hatch/Esq

Tracy W. Hatch, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission)
Triennial UNE Review: Location-Specific Review) Docket No. 030852-TP
for DS1, DS3 and Dark Fiber Loops, and Route-)
Specific Review for DS1, DS3 and Dark Fiber)
Transport.)

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 prefiled Rebuttal and Surrebuttal Testimony of Jay Bradbury on January 21, 2004 and February 4, 2004, respectively, for presentation at hearing. Due to the D.C. Circuit Court decision, the March 1, 2004 hearing was convened and prefiled testimony as well as all exhibits were admitted into the record. The conduct of cross-examination and other activities in the proceeding were then held in abeyance. The prefiled Rebuttal testimony of Jay Bradbury included information considered to be and treated as proprietary and confidential, and on January 21, 2004, AT&T filed the appropriate corresponding claim for confidentiality as to those portions of Mr. Bradbury's testimony pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. During the Commission meeting on March 1, 2004, Jay Bradbury's testimony was stipulated into the record pursuant to the parties' stipulation. The

testimony that was admitted contains the information subject to the January 21, 2004 claim of 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 the testimony of Jay Bradbury and specifically that information identified as confidential and which appears as follows:

Jay Bradbury – Rebuttal Testimony

Location	Description
Page 23, line 9 Columns 3 and 5	AT&T Actual Active On-Net Collocations Maximum Calculated Routes Possible (AT&T Proprietary Information)
Page 23, lines 16-17	BellSouth's inaccurate reporting over counts on-net collocations (AT&T Proprietary Information)

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 claim filed on January 21, 2004.

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.

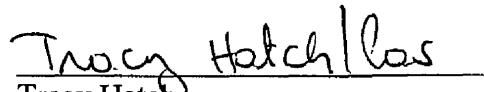
4. A trade secret is defined in Section 688.002(4), Florida Statutes, the Uniform Trade Secrets Act, to mean:

. . . Information, including a formula, patter, 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 informaiton 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 24th day of March 2004.


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