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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

05 NOV -7 PM 3: 21

In re: Petition to Establish Generic Docket
To Consider Amendments to Interconnection
Agreements Resulting from Changes of
Law.

Docket No. 041269-TP

Filed: November 7, 2005

COMMISSION
CLERK

COVAD COMMUNICATIONS COMPANY'S FIRST
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to Rule 25-22.006, Florida Administrative Code, files this First Request for Specified Confidential Classification.

1. On October 17, 2005 Covad responded to BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories to Network Telephone (Nos. 1- 3). Covad's response to Interrogatory No. 3 includes a spreadsheet attachment. The attachment contains information that is confidential proprietary business information concerning line location, wire centers and transport providers.

2. Because the discovery responses contain information that is confidential and proprietary, Covad simultaneously filed a Notice of Intent to Request Confidential Classification


CMP 1 pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the
COM _____ Commission to take possession of the responses without delay.

CTR _____
ECR _____
GCL 1 requirements of section 119.07, Florida Statutes, when disclosure of confidential business
OPC _____ information would "impair the competitive business of the provider of the information."

RCA _____ Disclosure of the information on the attached spreadsheet would harm Covad's competitive
SCR _____ interests by placing details of its business operations, specifically line locations, wire centers and
SGA _____ transport providers used by Covad, in the public domain. Accordingly, the information should
SEC 1

OTH leave records

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

be exempt from the public disclosure requirements of section 119.07, Florida Statutes. Further, Covad considers and treats this information as confidential and proprietary. A more specific description of the exhibit information is contained in Attachment A.

4. Appended hereto as Attachment B are two copies of the requested documents with the confidential classification redacted.

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents that NTC claims are confidential and proprietary.

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

s/ Vicki Gordon Kaufman

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Specified Confidential Classification was served on the following by electronic mail and U.S. Mail this 7th day of November 2005:

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s/Vicki Gordon Kaufman
Vicki Gordon Kaufman

ATTACHMENT A

DOCKET NO. 041269-TP

**COVAD COMMUNICATIONS'
FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Explanation of Proprietary Information

1. The copies contain **CONFIDENTIAL** information regarding the location of Covad's wire centers, lines and circuits and transport providers. This information is related to Covad's ongoing business affairs and operations and can be used by competitors to harm competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24 (a), Art. 1 of the State Constitution.

Attachment to Covad's Response to BellSouth's Interrogatory No. 3

<u>Page Nos.</u>	<u>Line(s)</u>	<u>Reason</u>
1	All	1

ATTACHMENT B

DOCKET NO. 041269-TP

COVAD'S

**FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION
ATTACHMENT TO COVAD'S RESPONSE TO BELL SOUTH'S INTERROGATORY
NO. 3 IS REDACTED IN ITS ENTIRETY**

ATTACHMENT B

DOCKET NO. 041269-TP

COVAD'S

FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

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