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Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re:

Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC ("Frontier Communications") are the following documents:

- 1. Original and fifteen copies of Smart City Telecom and Frontier Communications' Request for Specified Confidential Classification; and
- 2. An envelope marked "CONFIDENTIAL" containing a copy of the documents considered proprietary and confidential.

CMP_	Please acknowledge receipt of these documents by stamping the extra copy of this letter filed
COM_	and returning the copy to me. Thank you for your assistance with this filing.
CTR _	Sincerely,
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GCL _	
OPC _	Kenneth AUHoffman
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of TDS Telecom d/b/a)
TDS Telecom/Quincy Telephone, ALLTEL	Docket Nos. 050119-TP and 050125-TP
Florida, Inc., Northeast Florida Telephone)
Company d/b/a NEFCOM, GTC, Inc. d/b/a)
GT Com, Smart City Telecommunications,)
LLC d/b/a Smart City Telecom, ITS Tele-)
communications Systems, Inc. and Frontier)
Communications of the South, LLC,)
("Joint Petitioners") objecting to and)
requesting suspension of Proposed Transit)
Traffic Service Tariff filed by BellSouth)
Telecommunications, Inc.) Filed: April 5, 2006
)

SMART CITY TELECOM AND FRONTIER COMMUNICATIONS' REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC ("Frontier Communications"), by and through their undersigned counsel, and pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, file this Request for Specified Confidential Classification, and state as follows:

- 1. On March 16, 2006, the Joint Petitioners in Docket No. 050119-TP, hereinafter referred to as the "Small LECs," filed their responses to the Commission's Staff's Second Set of Interrogatories and First Request for Production of Documents.
- 2. The Small LECs' Response to Staff Document Request No. 1 contains proprietary confidential business information of Smart City Telecom and Frontier Communications. On March 16, 2006, Smart City Telecom and Frontier Communications filed their Notice of Intent to Request Specified Confidential Classification of such proprietary confidential business information. Pursuant to Rule 25-22.006(4), Florida Administrative Code, Smart City Telecom and Frontier Communications file this Request for Specified Confidential Classification of the proprietary

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FPSC-COMMISSION CLERK

confidential business information provided in response to the Small LECs' Response to Staff Document Request No. 1.

- 3. Section 364.183, Florida Statutes, provides an exemption from the public disclosure requirements of Section 119.07, Florida Statutes, for "proprietary confidential business information." Under Section 364.180(3)(e), Florida Statutes, "proprietary confidential business information" includes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information. In this case, the information provided by Smart City Telecom and Frontier Communications reflects:
 - (a) Total minutes of use to facility-based CLECs;
 - (b) Total minutes of use to meet point billed CMRS providers;
 - (c) Total originated transit traffic minutes of use;
 - (d) BellSouth's estimated percent local usage factor;
 - (e) Total transit traffic local minutes of use; and
 - (f) Monthly transit payments to BellSouth commencing February 11, 2005 through January 31, 2006.
- 4. The information described above provided in response to Staff Document Request No. relates to the competitive interests of Smart City Telecom and Frontier Communications and the public disclosure of such information would impair the competitive business of each such provider and provide a competitive advantage to competitors in the local exchange telecommunications services market. Smart City Telecom and Frontier Communications maintain that this information is proprietary confidential business information which, if publicly disclosed, could be used by competitors to harm the competitive interests of these carriers. The information for which

confidential classification is sought is intended to be and treated as private and confidential by Smart City Telecom and Frontier Communications, respectively, and has not been disclosed publicly or otherwise. Accordingly, the information should be determined to be proprietary confidential business information pursuant to Section 364.183(3)(e), Florida Statutes, exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

- 5. Attached as Attachment A are two copies of the redacted versions of Smart City Telecom's and Frontier Communications' responses to Staff's Document Request No. 1 included in Staff's First Request for Production of Documents.
- 6. Attached as Attachment B to the Request for Specified Confidential Classification are highlighted copies of the same documents containing the confidential information.

WHEREFORE, for the foregoing reasons, Smart City Telecom and Frontier Communications respectfully request that, pursuant to Section 364.183, Florida Statutes, the Commission enter an Order declaring the information described above to be proprietary confidential business information that is not subject to public disclosure.

Respectfully submitted,

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Martin P. McDonnell, Esq.

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Tallahassee, FL 32302

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Attorneys for Smart City Telecommunications, LLC d/b/a Smart City Telecom and Frontier Communications of the South, LLC

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was furnished to the following this 5th day of April, 2006, by Electronic Mail to the following:

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Kenneth A. Hoffman, Esc nftc\transit.traffic\requestforconfidential

ICO - ORIGINATING TRANSIT TRAFFIC 2005-2006 EMI* USAGE

DATE	STATE	ORIGINATING COMPANY NAME	ICO OCN	Total MOU's to Facility-Based CLEC's	Total MOU's to Meet-Point Billed CMRS	TOTAL MOU's	BELLSOUTH ESTIMATED PLU**	TOTAL TRANSIT LOCAL MOU'S	TRANSIT RATE	MONTHLY TRANSIT \$
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COMPOSITE EXHIBIT A TO SMALL LECS'
RESPONSES TO STAFF'S SECOND SET OF
INTERROGATORIES AND FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS

^{*} Exchange Message Interface

^{**} This is a Percent Local Usage (PLU) factor estimated by BellSouth, subject to further analysis.

ICO ORIGINATED TRANSIT TRAFFIC 2005-2006 EMI* USAGE

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* Exchange Message Interface

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^{*} Exchange Message Interface
** This is a Percent Local Usage (PLU) factor estimated by BellSouth, subject to further analysis.

CONFIDENTIAL DOCUMENTS

ATTACHMENT B