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April 10, 2006

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

HAND DELIVERY

RECEIVED-FPSC  
APR 10 PM 2:27  
COMMISSION  
CLERK

Re: Docket Nos. 050119-TP and 050125-TP

Dear Ms. Bayo:

CMP 1 Enclosed for filing in the above-referenced docket on behalf of Smart City  
Telecommunications, LLC d/b/a Smart City Telecom are the following documents:

COM \_\_\_\_\_  
CTR \_\_\_\_\_ 1. Original and fifteen copies of Smart City Telecom's Second Request for Specified  
Confidential Classification; and


ECR \_\_\_\_\_  
GCL 1 2. An envelope marked "CONFIDENTIAL" containing a copy of the documents  
considered proprietary and confidential.

OPC \_\_\_\_\_  
RCA \_\_\_\_\_ Please acknowledge receipt of these documents by stamping the extra copy of this letter filed  
and returning the copy to me. Thank you for your assistance with this filing.

SCR \_\_\_\_\_  
SGA \_\_\_\_\_

SEC 1  
OTH 1 conf records  
Sincerely,  
  
Kenneth A. Hoffman

KAH/rl  
Enclosures  
NFTC\transtitraffic\bayo april 10 06 ltr

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DOCUMENT NUMBER-DATE  
03195 APR 10 06  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition of TDS Telecom d/b/a )  
TDS Telecom/Quincy Telephone, ALLTEL )  
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. )  
\_\_\_\_\_ )

Docket Nos. 050119-TP and 050125-TP

Filed: April 10, 2006

**SMART CITY TELECOM'S SECOND REQUEST  
FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Smart City Telecommunications, LLC d/b/a Smart City Telecom, by and through its undersigned counsel, and pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, file this Second Request for Specified Confidential Classification, and states as follows:

1. On March 21, 2006, the Joint Petitioners in Docket No. 050119-TP, hereinafter referred to as the "Small LECs," in response to requests of the Commission Staff, served Late-Filed Deposition Exhibit Nos. 1 and 2 of Steven E. Watkins on the Commission Staff and the parties in this proceeding.

2. Mr. Watkins' Late-Filed Deposition Exhibit No. 2 contains proprietary confidential business information of Smart City Telecom. On March 21, 2006, Smart City Telecom filed its 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 files this Second Request for Specified Confidential Classification of the proprietary

DOCUMENT NUMBER-DATE

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confidential business information provided in Mr. Watkins' Late-Filed Deposition Exhibit No. 2.

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 identifies and summarizes data relative to the total number of BellSouth transited messages and minutes of use, including BellSouth transited messages and minutes of use broken down between competitive local exchange companies (in the aggregate) and CMRS providers (in the aggregate), for the period of May 1 through July 31, 2005.

4. The information described above provided in Mr. Watkins's Late-Filed Deposition Exhibit No. 2 relates to the competitive interests of Smart City Telecom and the public disclosure of such information would impair the competitive business of Smart City Telecom and provide a competitive advantage to competitors in the local exchange telecommunications services market. Smart City Telecom maintains that this information is proprietary confidential business information which, if publicly disclosed, could be used by competitors to harm its competitive interests. The information for which confidential classification is sought is intended to be and treated as private and confidential by Smart City Telecom, 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 proprietary confidential business information included in Mr. Watkins's Late-Filed Deposition Exhibit No. 2.

6. Attached as Attachment B to this Second Request for Specified Confidential Classification are highlighted copies of the same documents containing the confidential information.

WHEREFORE, for the foregoing reasons, Smart City Telecom respectfully requests 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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Smart City Telecom

**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing was furnished to the following this 10<sup>th</sup> day of April, 2006, by Electronic Mail to the following:

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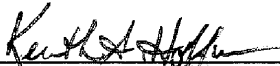
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By:   
Kenneth A. Hoffman, Esq.  
nftc\transit.traffic\secondrequestforconfidential

Response: The attached summary shows local/EAS call messages and minutes of use for Smart City Telecommunications, LLC for the months of May, June and July 2005. The traffic summarized in the attachment only includes local/EAS calls that are directed to NPA-NXXs associated with rate center areas served by BellSouth for which Smart City originates local calls (this scope of traffic represents those NPA-NXXs for which BellSouth may perform transit services in addition to the analogous traffic to BellSouth end users). For Smart City, the percentage of transited messages to total messages (for this scope of traffic) was [REDACTED] % for the period, and the percentage of transited minutes of use to the total minutes of use was [REDACTED] %.

These percentages are reflective of the time period measured, the extent of CLEC and CMRS provider activity in the relevant local calling area, the status of trunking arrangements between CLECs and CMRS providers and Smart City, etc. These percentages are likely not reflective of any other company, and may not be reflective for different time periods for Smart City. This summary should not be construed to suggest that any treatment of traffic under these conditions is proper or required.

Moreover, the absolute number of minutes of use of transit traffic that BellSouth has billed Smart City and Frontier has already been provided in response to the item 1 -- production of documents in response to Staff's Set II. The exhibit to that response summarizes the transit MOUs billed by BellSouth to these two Small LECs.

ATTACHMENT A

TRANSIT TRAFFIC  
SUMMARY BY MESSAGE VOLUME

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs  
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Call Messages Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
CMRS Providers Call Messages Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
Total Call Messages Transited by BellSouth for three-month period		= [REDACTED]
Total Local/EAS Call Messages to BellSouth end users during same period	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Total	[REDACTED]
Grand Total of all Local/EAS Call Messages to BellSouth/EAS areas		= [REDACTED]
Percentage of Call/Messages transited to CLECs	= [REDACTED]	%
Percentage of Call/Messages transited to CMRS Providers	= [REDACTED]	%
Total Percentage of Local Calls transited to third party carriers	= [REDACTED]	%



TRANSIT TRAFFIC  
SUMMARY BY CONVERSATION MINUTES OF USE

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs  
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
CMRS Providers Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
Total Minutes of Use Transited by BellSouth for three-month period	=	[REDACTED]
Total Local/EAS Minutes of Use to BellSouth end users during same period	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Total	[REDACTED]
Grand Total of Local/EAS Minutes of Use	=	[REDACTED]
Percentage of Minutes of Use transited to CLECs	=	[REDACTED] %
Percentage of Minutes of Use transited to CMRS Providers	=	[REDACTED] %
Total Percentage of Local Call Minutes of Use transited to third party carriers	=	[REDACTED] %

Response: The attached summary shows local/EAS call messages and minutes of use for Smart City Telecommunications, LLC for the months of May, June and July 2005. The traffic summarized in the attachment only includes local/EAS calls that are directed to NPA-NXXs associated with rate center areas served by BellSouth for which Smart City originates local calls (this scope of traffic represents those NPA-NXXs for which BellSouth may perform transit services in addition to the analogous traffic to BellSouth end users). For Smart City, the percentage of transited messages to total messages (for this scope of traffic) was [REDACTED]%, and the percentage of transited minutes of use to the total minutes of use was [REDACTED] %.

These percentages are reflective of the time period measured, the extent of CLEC and CMRS provider activity in the relevant local calling area, the status of trunking arrangements between CLECs and CMRS providers and Smart City, etc. These percentages are likely not reflective of any other company, and may not be reflective for different time periods for Smart City. This summary should not be construed to suggest that any treatment of traffic under these conditions is proper or required.

Moreover, the absolute number of minutes of use of transit traffic that BellSouth has billed Smart City and Frontier has already been provided in response to the item 1 -- production of documents in response to Staff's Set II. The exhibit to that response summarizes the transit MOUs billed by BellSouth to these two Small LECs.

TRANSIT TRAFFIC  
SUMMARY BY MESSAGE VOLUME

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs  
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Call Messages Transited by BellSouth

May 2005  
June 2005  
July 2005  
Subtotal

[REDACTED]

CMRS Providers Call Messages Transited by BellSouth

May 2005  
June 2005  
July 2005  
Subtotal

[REDACTED]

Total Call Messages Transited by BellSouth for three-month period

= [REDACTED]

Total Local/EAS Call Messages to BellSouth end users during same period

May 2005  
June 2005  
July 2005  
Total

[REDACTED]

Grand Total of all Local/EAS Call Messages to BellSouth/EAS areas

= [REDACTED]

Percentage of Call/Messages transited to CLECs

= [REDACTED] %

Percentage of Call/Messages transited to CMRS Providers

= [REDACTED] %

Total Percentage of Local Calls transited to third party carriers

= [REDACTED] %

TRANSIT TRAFFIC  
SUMMARY BY CONVERSATION MINUTES OF USE

Local/EAS calls originated by Smart City end users and terminated to Rate Center NPA-NXXs  
(NPA-NXXs associated with rate centers within the local EAS calling area)

CLEC Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
CMRS Providers Minutes of Use Transited by BellSouth	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Subtotal	[REDACTED]
Total Minutes of Use Transited by BellSouth for three-month period		= [REDACTED]
Total Local/EAS Minutes of Use to BellSouth end users during same period	May 2005	[REDACTED]
	June 2005	[REDACTED]
	July 2005	[REDACTED]
	Total	[REDACTED]
Grand Total of Local/EAS Minutes of Use		= [REDACTED]
Percentage of Minutes of Use transited to CLECs		= [REDACTED] %
Percentage of Minutes of Use transited to CMRS Providers		= [REDACTED] %
Total Percentage of Local Call Minutes of Use transited to third party carriers		= [REDACTED] %

**CONFIDENTIAL DOCUMENTS**

ATTACHMENT B