



Advanced • Secure • Communications

July 11, 2006

VIA FEDERAL EXPRESS

Beth Salak
Florida Public Service Commission
Director of the Division of Competitive
Markets & Enforcement
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

FLORIDA PUBLIC SERVICE COMMISSION
COMPETITIVE SERVICES CLERK

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Re: Request for Confidentiality; Responses to Year 2006 Local Competition Report Data Request

Dear Ms. Salak:

In response to the Year 2006 Local Competition Report Data Request (the "Data Request") propounded by the Florida Public Service Commission (the "Commission"), and pursuant to Commission Rule 25-22.006, Florida Administrative Code, TelCove Investment, LLC and TelCove of Jacksonville, Inc. (collectively, "TelCove") hereby simultaneously submit their responses to the Data Request and request confidential treatment of the information provided by TelCove in response to questions 11(c), and 18, as well as the ILEC Exchange List, Total VGE Lines columns in CLEC Table 1 and Table 3; the Total Lines columns in CLEC Table 2; and Parts I, II, and V of FCC Form 477 (collectively, the "Confidential Information").

With respect to the Confidential Information, in each case, it constitutes "proprietary confidential business information" as that term is defined in FS 364.183(3). Specifically the Confidential Information contains information revealing the pricing of VOIP services [Question 11(c)]; network investment (Question 18); line counts (Total VGE Lines columns in CLEC Table 1 and Table 3, and Total Lines columns in CLEC Table 2); exchange names where TelCove provides service (ILEC Exchange List); and the means of provisioning and location of service provision (FCC Form 477). The information supplied by TelCove in response to each of those inquiries constitutes both trade secrets of TelCove and information relating to TelCove's competitive interests, the disclosure of which would impair TelCove's competitive business. (See FS 364.183(3)(e).) (With respect to FCC Form 477, the redacted information has already been accorded confidential treatment pursuant to the FCC's rules.)

Accordingly, it would be appropriate for the Commission to grant the confidential status requested by TelCove. In compliance with Commission Rule 25-22.006, Florida Administrative Code, TelCove has attached one (1) highlighted, un-redacted copy of its

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responses to the Data Requests, two (2) redacted copies of the same, and a CD containing Microsoft Excel redacted and unredacted versions of Tables 1, 2, 3, and the ILEC Exchange List. Upon receipt of these documents for filing, please respond to this correspondence with a confirmation of the same.

On July 1, 2005, TelCove, through its parent company, completed its purchase of KMC Telecom, Inc. (KMC). The transition of the data from KMC to TelCove for these customers is still in progress. As such, the data necessary to complete the Lines Counts (Tables 1, 2 and 3) portion of this report does not include the newly acquired KMC customers. Upon request, we will adjust the report once the data transfer is complete to reflect the differences.

If you have any question, please do not hesitate to contact me.

Thank you for your cooperation and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Pado', is written over a horizontal line.

Keith Pado
Manager of Legal & Regulatory Affairs

Enclosures