

Matilda Sanders

From: Keating, Beth [beth.keating@akerman.com]
Sent: Friday, December 15, 2006 2:29 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 060650-TL
Attachments: 20061215145618241.pdf

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OTH *Marquardt*

Good afternoon,

Please find the attached document, which is submitted for filing, as set forth below.

A. The person responsible for this filing is:

Beth Keating
Akerman Senterfitt
106 East College Ave., Suite 1200
Tallahassee, FL 32301
(850) 224-9634
(850) 521-8002 (direct)
beth.keating@akerman.com

B. The Docket in which the document should be filed is:

Docket No. 060650-TL - JOINT PETITION AGAINST BELLSOUTH TELECOMMUNICATIONS, INC., EMBARQ FLORIDA, INC., AND VERIZON FLORIDA INC. FOR BILLING CHARGES UNAUTHORIZED BY TELECOMMUNICATIONS CONSUMER PROTECTION ACT AND REQUEST FOR REFUNDS, BY CITIZENS OF THE STATE OF FLORIDA AND ATTORNEY GENERAL

C. The company on whose behalf this letter is filed is:

Email Discount Network

D. Total number of pages in attached document: 2

E. Description: That attached document is a letter asserting a Claim of Confidentiality pursuant to Rule 25-22.006(5), F.A.C., for information provided in discovery responses



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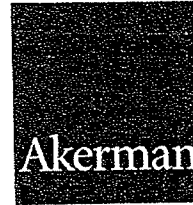
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Akerman Senterfitt
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December 15, 2006

VIA ELECTRONIC FILING

Blanca S. Bayó, Director
Division of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 060650-TL - JOINT PETITION AGAINST BELLSOUTH TELECOMMUNICATIONS, INC., EMBARQ FLORIDA, INC., AND VERIZON FLORIDA INC. FOR BILLING CHARGES UNAUTHORIZED BY TELECOMMUNICATIONS CONSUMER PROTECTION ACT AND REQUEST FOR REFUNDS, BY CITIZENS OF THE STATE OF FLORIDA AND ATTORNEY GENERAL – (Claim of confidentiality)

Dear Ms. Bayó:

On December 13, 2006, certain proprietary customer account information was provided to the Public Service Commission staff by the Attorney General's Office in response to discovery requests. That information was provided on CD ROM, Bates Stamp No. DL 0000696. On an undefined prior date, similar information specific to Florida customers was also apparently provided on a separate CD ROM to Public Service Commission staff by the Attorney General's Office, as referenced in the Attorney General's Response to Staff's First Request for Production of Documents No. 1. The information contained on the referenced CD ROMs is the property of Email Discount Network and had previously been provided by Email Discount Network (EDN) to the Attorney General's Office at the request of counsel with the Attorney General's Office. In providing the information to the Attorney General's Office, the information had been clearly identified by EDN as proprietary, confidential information.

{TL107219;1}

DOCUMENT NUMBER-DATE

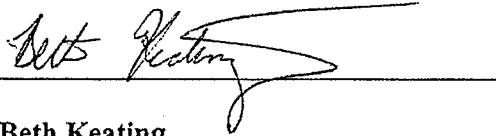
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The information contained on these CD ROMs meets the definition of proprietary, confidential business information as set forth in Section 364.183, Florida Statutes, and it has not otherwise been disclosed in any venue. The CD ROMs contain information regarding EDN's customer accounts, including customers' enrollment periods, refunded customers, and customer usage. Consequently, Email Discount Network respectfully requests that the information contained on the referenced CD ROMs provided by the Attorney General's Office to Public Service Commission staff be protected, in its entirety, as "proprietary, confidential business information" in accordance with Rule 25-22.006(5), Florida Administrative Code.

Thank you for your attention to this matter. I appreciate your assistance. If you have any questions, please do not hesitate to contact me at the number below.

Sincerely,



Beth Keating
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

cc. All Parties of Record