



Fort Lauderdale  
Jacksonville  
Los Angeles  
Madison  
Miami  
New York  
Orlando  
Tallahassee  
Tampa  
Tysons Corner  
Washington, DC  
West Palm Beach

Suite 1200  
106 East College Avenue  
Tallahassee, FL 32301  
[www.akerman.com](http://www.akerman.com)  
850 224 9634 *tel* 850 222 0103 *fax*

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)**

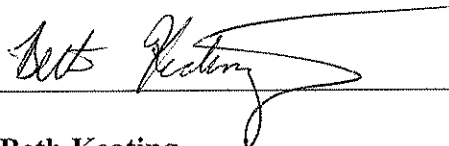
Dear Ms. Bayó:

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.

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