## **EXHIBIT C – FIELD-BY-FIELD JUSTIFICATION**

**PSC Subpoena Duces Tecum-001.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the identities of its wholesale network long distance services customers and the specific services provided to those customers. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-002.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the identities of its wholesale network long distance services customers and the related durations of service. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

PSC Subpoena Duces Tecum-003. All of the information contained CMP \_\_\_\_\_\_in this response is proprietary confidential business information because it represents information relating to QCC's COM competitive interests under Section 364.183(e), Florida CTR \_\_\_\_\_Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if ECR \_\_\_ forced to disclose the identities of its wholesale network long GCL -distance services customers and the specific service offerings OPC \_\_\_\_\_provided. Further, this confidential information represents data related to specific QCC customer contracts under Section RCA \_\_\_\_\_364.183(d), Florida Statutes, the disclosure of which would SCR \_\_\_\_\_impair the efforts of QCC to contract for goods or services on favorable terms. SGA

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**PSC Subpoena Duces Tecum-004.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the identities of its wholesale network long distance services customers and the nature and durations for services provided to those customers. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-005.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the identities of its wholesale network long distance services customers and the nature and durations for services provided to those customers. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-006.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the identities of its wholesale network long distance services customers and the number of retail customers served where QCC was or is the underlying carrier. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-007.** All of the information contained in this response as provided electronically on a CD-ROM disk is proprietary confidential business information because it represents information relating to QCC's competitive interests

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under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose the contracts for its wholesale services customers and the rates, terms, and conditions for services provided to those customers. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-008.** All of the information contained in this response is proprietary confidential business information because it represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, regarding the method of payment to QCC, and the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-009.** All of the information contained in this response is proprietary confidential business information because it represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, regarding the method of payment to QCC, and the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

Please note that this is a <u>corrected</u> response to the version previously provided to the Commission on December 24, 2007, with QCC's filing of its Notice of Intent to Request Specified Confidential Classification, which contained an inadvertent scrivener's error.

**PSC Subpoena Duces Tecum-010.** All of the information contained in this response is proprietary confidential business information because it represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, regarding QCC's customer-specific billing practices, and the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-011.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive

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business of QCC. QCC's competitive interests would be harmed if forced to disclose specific information regarding QCC's use of billing clearinghouses. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, regarding billing practices, and the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

**PSC Subpoena Duces Tecum-012.** All of the information contained in this response is proprietary confidential business information because it represents information relating to QCC's competitive interests under Section 364.183(e), Florida Statutes, and its disclosure would impair the competitive business of QCC. QCC's competitive interests would be harmed if forced to disclose specific customer contact information regarding QCC's wholesale service customers. Further, this confidential information represents data related to specific QCC customer contracts under Section 364.183(d), Florida Statutes, regarding the underlying confidential business relationships between QCC and specific QCC customers, and the disclosure of which would impair the efforts of QCC to contract for goods or services on favorable terms.

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