

J. Phillip Carver Senior Attorney Legal Department

AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, FL 32301 T: 404.335.0710 F: 404.614.4054 j.carver@att.com

June 18, 2008

Ms. Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 070736-TP: In the Matter of the Petition of Intrado Communications Inc. for Arbitration Pursuant to Section 252(b) of the Communications Act of 1934, as Amended, to Establish an Interconnection Agreement with BellSouth Telecommunications, Inc. d/b/a AT&T Florida

Dear Ms. Cole:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Confidential Classification, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

| CMP)   |  |
|--|--|
| 2 S and a second |  |
| The state of the s |  |
| And the second   |  |
| €/4. <u>  cc:</u>  | All parties of record                        |
| DFC  | Gregory Follensbee<br>E. Earl Edenfield, Jr. |
| *  | Lisa S. Foshee                               |
| SOR  |  |
| The state of the s |  |
| Control of the Contro |  |
| I conf   | •  |
| recbr  | 45   |

Sincerely,

Mary Jakes

J. Phillip Carver

This confidentiality request was filed by or for a "telco" for DN () S | 80 - 8. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT ALMBER-DATE

05179 JUN 188

FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE Docket No. 070736-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and First Class U.S. Mail this 18th day of June, 2008 to the following:

Lee Eng Tan
Charlene Poblete
Michael Barrett
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Tel. No. (850) 413-6185
<a href="mailto:team.org/line">ttan@psc.state.fl.us</a>
cpoblete@psc.state.fl.us
MBarrett@psc.state.fl.us

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
Tel. No. (202) 862-8950/8930
Fax. No. (202) 862-8958
ckiser@cgrdc.com
acollins@cgrdc.com

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, FL 32308
Tel. No. (850) 425-5213
Fax. No. (850) 558-0656
fself@lawfla.com

Rebecca Ballesteros
Associate Counsel
Intrado Communications, Inc.
1601 Dry Creek Drive
Longmont, CO 80503
Tel. No. (720) 494-5800
Fax. No. (720) 494-6600
rebecca.ballesteros@intrado.com

J. Phillip Carver

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Petition by Intrado Communications, Inc. | ) Docket No: 070736-TL |
|---|------------------------|
| For arbitration of certain rates, terms, and    | )                      |
| Conditions for interconnection and related      | ) Filed: June 18, 2008 |
| Arrangements with BellSouth                     | )                      |
| Telecommunications, Inc. d/b/a AT&T Florida,    | )                      |
| Pursuant to Section 252(b) of the               | )                      |
| Communications Act of 1934, as amended, and     | )                      |
| Sections 120.80(13), 120.57(1), 364.15,         | )                      |
| 364.16, 364.161, and 364.162, F.S., and Rule    | )                      |
| 28-106.201, F.A.C.                              | )                      |
|   | )                      |

# AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its Request for Specified Confidential Classification ("RCC").

- 1. On May 28, 2008, AT&T Florida filed its Responses to Florida Public Service Commission Staff's ("Staff") First Set of Interrogatories and Staff's First Request for Production of Documents.
- AT&T filed a Notice of Intent to Request Specified Confidential Classification for its Responses to Staff's First Request for Production of Documents No. 1 on that same day.
- 3. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because its Response to Staff's First Request for Production of Documents No. 1 contains information considered confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. A more specific description of this information is contained in Attachment A.

DOCUMENT NUMBER - DATE

- 4. Public disclosure of this information would cause competitive harm to AT&T Florida and provide competitors with an unfair advantage. The information discussed in this Request for Specified Confidential Classification is valuable and AT&T Florida strives to keep it secret. Therefore, such information should be classified as confidential business information pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.
- 5. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by AT&T Florida as confidential.
- 6. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the document containing the confidential information.
- 7. Attachment C to AT&T Florida's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.
- 8. The original of this Request was filed today with the Office of the Commission Clerk and a copy was served on the Parties.

WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

### Respectfully submitted this 18th day of June, 2008.

E. Earl Edenfield, Jr.
Tracy W. Hatch
Manuel A. Gurdian
AT&T Florida
c/o Gregory R. Follensbee
150 South Monroe Street, Suite 400
Tallahassee, FL 32301

Lisa S. Foshee J. Phillip Carver AT&T Southeast Suite 4300

(305) 347-5558

675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0750

#### **ATTACHMENT A**

AT&T Florida FPSC Dkt No. 070736-TP Staff's 1<sup>st</sup> Request for Production Page 1 of 1 06/18/08

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION, ITEM NO. 1, FILED MAY 28, 2008 IN FLORIDA DOCKET NO. 070736-TP

#### **Explanation of Proprietary Information**

1. This information consists of the commercially valuable and confidential work product of Telcordia Technologies ("Telcordia") that is not made freely available to the public. Under Section 5 of the Amended and Restated Master Agreement for Software and Services with Telcordia, AT&T is bound by Telcordia to maintain the confidentiality of this information, which AT&T strives to maintain. The disclosure of this trade secret material could result in the impairment of AT&T's ability to contract for such research information in the future and could impair the competitive business of both Telcordia and AT&T. Thus, this information is entitled to confidential classification pursuant to Section 361.183(3)(a), 3(d), and 3(e), Florida Statues and is exempt from the Open Records Act.

#### POD NO. 1:

| Document Name:  | <u>Location:</u> | Reason: |
|---|------------------|---------|
| COMMON LANGUAGE® Location<br>Codes (CLLI™ Codes) Description for<br>Location Identification | Entire Document  | 1       |
| COMMON LANGUAGE® Message<br>Trunk Circuit Codes (CLCI™ MSG Codes)                           | Entire Document  | 1       |
| Trunk Group Service Request – Industry Support Interface                                    | Entire Document  | 1 -     |
| Telcordia - Notes on the Networks   | Entire Document  | 1       |

#### ATTACHMENT B

AT&T Florida FPSC Dkt No. 070736-TP Staff's 1<sup>st</sup> Request for Production Page 1 of 1 06/18/08

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION, ITEM NO. 1, FILED MAY 28, 2008 IN FLORIDA DOCKET NO. 070736-TP

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

AT&T Florida FPSC Dkt No. 070736-TP Staff's 1<sup>st</sup> Request for Production May 8, 2008 Item No. 1

## ENTIRE DOCUMENT REDACTED

COMMON LANGUAGE® Location Codes (CLLI<sup>TM</sup> Codes) Description for Location Identification

COMMON LANGUAGE® Message
Trunk Circuit Codes (CLCI<sup>TM</sup> MSG Codes)

Trunk Group Service Request – Industry Support Interface

Telcordia - Notes on the Networks

AT&T Florida FPSC Dkt No. 070736-TP Staff's 1<sup>st</sup> Request for Production May 8, 2008 Item No. 1

## ENTIRE DOCUMENT REDACTED

COMMON LANGUAGE® Location Codes (CLLI<sup>TM</sup> Codes) Description for Location Identification

COMMON LANGUAGE® Message Trunk Circuit Codes (CLCI<sup>TM</sup> MSG Codes)

Trunk Group Service Request – Industry Support Interface

Telcordia - Notes on the Networks

#### ATTACHMENT C

AT&T Florida FPSC Dkt No. 070736-TP Staff's 1<sup>st</sup> Request for Production Page 1 of 1 06/18/08

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION, ITEM NO. 1, FILED MAY 28, 2008 IN FLORIDA DOCKET NO. 070736-TP

**ONE HIGHLIGHTED COPY** 

#### STATE OF FLORIDA

COMMISSIONERS: MATTHEW M. CARTER II, CHAIRMAN LISA POLAK EDGAR KATRINA J. MCMURRIAN NANCY ARGENZIANO NATHAN A. SKOP



OFFICE OF COMMISSION CLERK ANN COLE COMMISSION CLERK CONFIDETIAL

# Hublic Service Commission

#### **ACKNOWLEDGEMENT**

|       | <b>DATE</b> : June 18, 2008                       |
|-------|---|
| TO:   | J. Phillip Carver, At&T                           |
| FROM: | Ruth Nettles, Office of Commission Clerk          |
| RE:   | Acknowledgement of Receipt of Confidential Filing |
|       |   |

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 070736 or, if filed in an undocketed matter, concerning responses to staff's 1st set of interrogatories and staff's 1st request for PODs, and filed on behalf of At&T. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard. Deputy Clerk, at (850) 413-6770.

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850 An Affirmative Action/Equal Opportunity Employer

PSC Website: http://www.floridapsc.com

Internet E-mail: contact@psc.state.fl.us