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July 7, 2008

PH 3: )-FPSC

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.

	Sincerely J. Phillip Carver
All parties of record Gregory Follensbee E. Earl Edenfield, Jr. Lisa S. Foshee	This confidentiality request was filed by or for a "telco" for DN <u><math>25817-08</math></u> . 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. (X-r4.05541-08)
Proud Sponsor of the U.S. Olympic Team	DOCUMENT NUMBER-DATE O 5816 JUL-78 FPSC-COMMISSION CLERK

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition by Intrado Communications, Inc. For arbitration of certain rates, terms, and Conditions for interconnection and related 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. Docket No: 070736-TL

Filed: July 7, 2008

## 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 June 26, 2008, AT&T Florida filed its Responses to Florida Public Service Commission Staff's ("Staff") Third Set of Interrogatories and Staff's Third Request for Production of Documents.

2. AT&T filed a Notice of Intent to Request Specified Confidential Classification for its Responses to Staff's Third Set of Interrogatories No. 88 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 Third Set of Interrogatories No. 88 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 0 58 1 6 JUL -7 8 FPSC-COMMISSION CLERK

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 7th day of July, 2008.

lim for 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 (305) 347-5558

hn kişa S. Foshee

J. Phillip Carver AT&T Southeast Suite 4300 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0750

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## 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 7th day of July, 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 Itan@psc.state.fl.us 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 <u>ckiser@cgrdc.com</u> 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

#### ATTACHMENT A

AT&T Florida FPSC Dkt No. 070736-TP Staff's 3rd Set of Interrogatories Page 1 of 1 07/03/08

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S THIRD REQUEST FOR INTERROGATORIES, ITEM NO. 88, FILED JUNE 26, 2008 IN FLORIDA DOCKET NO. 070736-TP

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

 The subject material includes confidential business information of AT&T Florida. In particular, this information consists of the location of various selective routers in Florida, which is treated by AT&T Florida as proprietary and is information not readily available to the general public. Moreover, the public disclosure of this information could threaten the public's safety and security in that it would reveal points of vulnerably on the Emergency 911 service network; and thus, AT&T Florida strives to keep it secret. Therefore, AT&T Florida deems this information proprietary and confidential pursuant to Section 364.183(3)(c), Florida Statutes and thus, exempt from the Open Records Act.

#### **ITEM NO. 88:**

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	Location:	<u>Reason:</u>
070736-TP ATT Response to Staff 3rd.pdf	Response A	1

## ATTACHMENT B

AT&T Florida FPSC Dkt No. 070736-TP Staff's 3rd Set of Interrogatories Page 1 of 1 07/03/08

# REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S THIRD REQUEST FOR INTERROGATORIES, ITEM NO. 88, FILED JUNE 26, 2008 IN FLORIDA DOCKET NO. 070736-TP

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TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

#### ATTACHMENT C

AT&T Florida FPSC Dkt No. 070736-TP Staff's 3rd Set of Interrogatories Page 1 of 1 07/03/08

## REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S THIRD REQUEST FOR INTERROGATORIES, ITEM NO. 88, FILED JUNE 26, 2008 IN FLORIDA DOCKET NO. 070736-TP

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**ONE HIGHLIGHTED COPY** 

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

TO:

**STATE OF FLORIDA** 



OFFICE OF COMMISSION CLERK **ANN COLE COMMISSION CLERK** (850) 413-6770

Hubli	c Serbice Comm	ission
	ACKNOWLEDGEMENT	CONFIDENTIA
	DATE: July 7, 2008	
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 filing made on 6/26/08, concerning AT&T's responses to staff's 3rd set of interrogatories and staff's 3rd 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. DOCUMENT NUMBER - CAT

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PSC/CLK 019-C (Rev. 05/07)

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