



Suzanne L. Montgomery
General Attorney - Florida

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5558
F: (305) 577-4491
sm6526@att.com

RECEIVED-FPSC

12 MAR -6 PM 4:33

COMMISSION
CLERK

March 6, 2012

Ann Cole, Commission Clerk
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 110087-TP: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Request for Specified Confidential Classification for its *Supplemental* response to Express Phone Service, Inc.'s First Request for Production Nos. 2, 3, 7 and 8, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Suzanne L. Montgomery

cc: All Parties of Record
Gregory R. Follensbee

1020538

COM _____
APA _____
ECR _____
GCL _____
AAD 1 _____
SRC _____
ADM _____
OPC _____
CLK 1-MM _____

_____ claim of confidentiality
_____ notice of intent
 request for confidentiality
_____ filed by OPC

For DN 01319-12, which is in locked storage. You must be authorized to view this DN.-CLK

DOCUMENT NUMBER-DATE

01318 MAR-6 02

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 110087-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (*) Federal Express and First Class U.S. Mail this 6th day of March, 2012 to the following:

Lee Eng Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Express Phone Service
Mr. Tom Armstrong (+)(*)
1803 West Fairfield Drive, Unit 1
Pensacola, FL 32501-1040
Tel. No.: (850) 291-6415
Fax No.: (850) 308-1151
tom@dei.qccoxmail.com

Keefe Law Firm
Vicki Gordon Kaufman (+)(*)
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No.: 850-681-3828
Fax No.: 850-681-8788
vkaufman@kaqlaw.com
Atty. for Express Phone

Mark Foster
707 West Tenth Street
Austin, Texas 78701
Tel. No.: (512) 708-8700
Fax. No.: (512) 697-0058
mark@mfoosterlaw.com
Atty. for Express Phone


Suzanne L. Montgomery

(+) Signed Protective Agreement
916796

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Notice of the Adoption of existing) Docket No. 110087-TP
interconnection, unbundling, resale, and)
collocation agreement between BellSouth)
Telecommunications, Inc. d/b/a AT& T)
Florida d/b/a AT&T Southeast and Image)
Access, Inc. d/b/a New Phone, Inc. by Express)
Phone Service, Inc.)
_____) Filed: March 6, 2012

AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

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

1. On February 14, 2012, AT&T Florida served its *Supplemental* Responses to Express Phone Service, Inc.'s ("Express Phone") First Request for Production of Documents Nos. 2, 3, 7 and 8, dated January 24, 2012.

2. AT&T Florida's responses to Express Phone's First Request for Production of Documents Nos. 2, 3, 7 and 8 contain information that is considered confidential and proprietary as it contains AT&T company policies and policy development information. A more specific description of this information is contained in Attachment A.

3. The information discussed in the Request for Specified Confidential Classification is confidential to AT&T Florida and related to its competitive interests. 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*.

REC'D
MAR 6 2012

DOCUMENT NUMBER DATE

01318 MAR-6 2012

FPSC-COMMISSION CLERK

4. Attachment A to AT&T's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated as confidential.

5. Attachment B to AT&T's Request for Confidential Classification is two redacted copies of the documents.

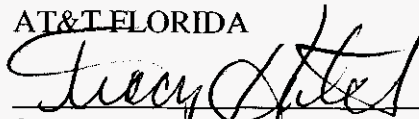
6. Attachment C to AT&T's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

7. 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 6th day of March, 2012.

AT&T FLORIDA



Suzanne L. Montgomery
Authorized House Counsel No. 94116
Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558
sm6526@att.com
th9467@att.com

1026518

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
03/06/2012**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
SUPPLEMENTAL RESPONSES TO EXPRESS PHONE'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS NOS. 2, 3, 7 AND 8,
IN DOCKET NO. 110087-TP**

Explanation of Proprietary Information

1. This information contains confidential proprietary business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information contains internal company policies and policy development information the disclosure of which will give AT&T Florida's competitors a competitive advantage and harm the internal operations of AT&T Florida. This information is not publicly available. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

Location

Reason

Supplemental Response to Request No. 2

Page 1, lines 6-37	1
Page 2, lines 4-26	1
Page 3, lines 6-39	1
Page 4, lines 4-22	1
Page 6, lines 3-29	1

Supplemental Response to Request No. 3, 7 and 8

Page 1, lines 3-40	1
Page 3, lines 3-29	1
Page 5, lines 3-32	1
Page 7, lines 3-22	1
Page 10, lines 3-40	1
Page 14, lines 3-33	1
Page 16, lines 3-25	1

ATTACHMENT B

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
03/06/2012**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
SUPPLEMENTAL RESPONSES TO EXPRESS PHONE'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS NOS. 2, 3, 7 AND 8,
IN DOCKET NO. 110087-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
03/06/2012**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
SUPPLEMENTAL RESPONSES TO EXPRESS PHONE'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS NOS. 2, 3, 7 AND 8,
IN DOCKET NO. 110087-TP**

ONE HIGHLIGHTED COPY