

RUTLEDGE, ECENIA & PURNELL

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

MICHAEL J. BARRY
STEPHEN A. ECENIA
RICHARD M. ELLIS
DIANA FERGUSON
MARTIN P. McDONNELL
J. STEPHEN MENTON
R. DAVID PRESCOTT

POST OFFICE BOX 551, 32302-0551
119 SOUTH MONROE STREET, SUITE 202
TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
MAGGIE M. SCHULTZ
GABRIEL F.V. WARREN
GOVERNMENTAL CONSULTANTS
RYAN J. ANDERSON

April 13, 2012

CONFIDENTIAL DOCUMENTS ENCLOSED

VIA HAND DELIVERY

Ms. Ann Cole, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

X _____ in confidentiality
_____ of intent
_____ request for confidentiality
_____ filed by OPC

For DN 02288-12, which
is in locked storage. You must be
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APR 13 PM 4:13
COMMISSION
CLERK

Re: **CLAIM OF CONFIDENTIALITY:**
Northeast Florida Telephone Company's Response to 2012 Local Competition Report
Data Request

Dear Ms. Cole:

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5)(a), Florida
Administrative Code, Northeast Florida Telephone Company ("Northeast Florida") hereby claims
confidential treatment for certain portions of its Response to the 2012 Local Competition Report
Data Request.

Enclosed herewith are the following attachments:

- (1) Attachment "A" - two copies of Northeast Florida's Response with the specific
information claimed to be confidential redacted; and
- (2) Attachment "B" - a sealed envelope marked "CONFIDENTIAL" containing:
 - (a) Northeast Florida's complete unedited Response in electronic format; and
 - (b) Northeast Florida's Response with the specific information claimed to be
confidential highlighted in yellow

COM _____
APA _____
ECR _____
GCL _____
RAD 1 _____
SRC _____
ADM _____
OPC _____
CLK 1 _____

Northeast Florida asserts that the portions of its Response described below contain
1 proprietary confidential business information regarding the business plans of both Northeast Florida

DOCUMENT NUMBER-DATE

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and its affiliate, NEFCOM Communications. The services addressed in the Response are local services and advanced services. Northeast Florida and its affiliate, NEFCOM Communications, are currently experiencing competition from other service providers with respect to such services within Northeast Florida's service territory.

Pursuant to Section 364.183(1), Florida Statutes, upon the filing of Northeast Florida's claim that such information is proprietary confidential business information, such information shall be kept confidential and shall be exempt from Section 119.07(1) and Section 24(a), Art. I of the State Constitution. The specific portions of the Response Northeast Florida claims as proprietary confidential business information are as follows:

1. Question No. 5 – Bundle Services & Prepaid Service: Disclosure of Northeast Florida's response to this item would provide Northeast Florida's competitors with proprietary confidential information regarding Northeast Florida's involvement in the highly competitive market of prepaid service. This type of proprietary confidential business information is not made public under any other circumstances.

2. Question Nos. 6-8 – VoIP: Disclosure of Northeast Florida's response to this item would provide Northeast Florida's competitors with proprietary confidential information regarding Northeast Florida's involvement in the highly competitive market of the provision of VoIP. This type of proprietary confidential business information is not made public under any other circumstances.

3. Question Nos. 9-14: - Broadband: Disclosure of Northeast Florida's response to this item would provide Northeast Florida's competitors with proprietary confidential business information regarding Northeast Florida's involvement in the market for broadband services within Northeast Florida's service territory. This type of proprietary confidential business information is not made public under any other circumstances.

4. Question Nos. 15-17 – Fiber Deployment: Disclosure of Northeast Florida's response to this item would provide Northeast Florida's competitors with proprietary confidential business information regarding Northeast Florida's involvement in the market for fiber deployment within Northeast Florida's service territory. This type of proprietary confidential business information is not made public under any other circumstances.

5. Question No. 18 – Video Services: Disclosure of Northeast Florida's response to this item would provide Northeast Florida's competitors with proprietary confidential business information regarding Northeast Florida's involvement in the market for video services within Northeast Florida's service territory. This type of proprietary confidential business information is not made public under any other circumstances.

6. Table 1: The information provided in Table 1 consists of competitively sensitive information related to Northeast Florida's access lines. This information differs from Northeast

Florida's response to Question 1 in that the numbers in Table 1 provide the access line date down to the exchange level. Such information is considered by Northeast Florida to be proprietary confidential business information.

7. Table 2: The information provided in Table 2 consists of detailed VoIP information that Northeast Florida considers proprietary and confidential.

8. FCC Form 477: Northeast Florida's responses to FCC Form 477 contains proprietary confidential information that is treated as confidential by the FCC and should be treated as confidential by the Florida Public Service Commission.

A copy of this letter, along with a public copy of Northeast Florida's Response have been hand delivered to Beth Salak, Division of Competitive Markets & Enforcement, concurrent with this filing.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,



Martin P. McDonnell

Enclosures

cc: Ms. Beth Salak