

MCWHIRTER REEVES ORIGINAL
ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:
TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

July 10, 2001

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

CONFIDENTIAL

Re: Docket No.: 001797-TP

Dear Ms. Bayo:

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company, enclosed for filing and distribution are the original and 15 copies of DIECA Communications, Inc. d/b/a Covad Communications Company's Request for Specified Confidential Classification and Motion for Protective Order with CONFIDENTIAL documents attached.

Please acknowledge receipt of the above on the extra copy and return the stamped copies to me in the envelope provided. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/bae
Enclosures
cc: Catherine F. Boone

This confidentiality request was filed by or for a "telco" for DN 08421-01. 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.

RECEIVED & FILED
Mur
FPSC-BUREAU OF RECORDS

(See DN 07624-01)
Request
DOCUMENT NUMBER-DATE

CONFIDENTIAL
DOCUMENT NUMBER-DATE
08421 JUL 10 2001
FPSC-RECORDS/REPORTING

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STERN, P.A.

JUL 10 2001
FPSC-RECORDS/REPORTING

RECEIVED-FPSC
JUL 10 PM 4:23
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by DIECA Communications,
Inc., d/b/a Covad Communications Company
for Arbitration of Unresolved Issues in
Interconnection Agreement with BellSouth
Telecommunications, Inc.

Docket No. 001797-TP

Filed: July 10, 2001

-----/
**DIECA COMMUNICATIONS, INC. d/b/a COVAD COMMUNICATIONS COMPANY'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PROTECTIVE ORDER**

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to section 364.183, Florida Statutes, and rule 25-22.006, Florida Administrative Code, files its Request for Confidential Classification and Motion for Protective Order as to the materials described herein. In support thereof, Covad states:

1. On June 19, 2001, Covad responded to Staff's Second Request for Production of Documents (Nos. 8 and 10). On the same day, Covad filed its Notice of Intent to Request Confidential Classification for this material.

2. The documents which are responsive to Staff Request No. 8 contain information specifically related to the conduct of Covad's business, such as the number of orders submitted by Covad. The response to Request No. 10 contains customers' telephone numbers which Covad must keep confidential for privacy reasons as well as pursuant to section 364.24(2), Florida Statutes. A more specific description of this information is contained in Attachment A.

3. As to Request No. 8, Covad considers this information to be confidential and proprietary business information. Its disclosure would harm Covad's business operations by putting

details of Covad's operations and business decisions in the public domain. This information is valuable and Covad keeps it strictly confidential. Section 364.1833(e) includes in the category of "proprietary confidential business information" information which relates to "competitive interests, the disclosure of which would impair the competitive business of the provider of information." Clearly, the information produced by Covad falls within that category. Accordingly, it should be exempt from the public disclosure requirements of section 119.07, Florida Statutes.

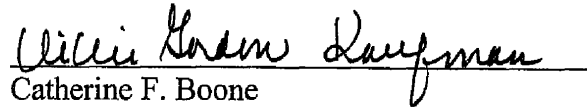
4. As to Request No. 10, Covad is prohibited from disclosing customer account information pursuant to section 364.24(2), Florida Statutes, which prohibits the disclosure of customer account records, which would include customer telephone numbers.

5. Covad has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

6. Appended hereto as Attachment B is two copies of the requested documents with the confidential information redacted.

7. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents including the material which is confidential and proprietary.

WHEREFORE, based on the foregoing, Covad moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.


Catherine F. Boone
Covad Communications Company
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328
(678) 579-8388 Telephone
(678) 320-9433 Telefax

Vicki Gordon Kaufman
McWhirter Reeves McGlothlin Davidson
Decker Kaufman Arnold & Steen, P.A.
117 South Gadsden Street
Tallahassee, FL 32301
(850) 222-2525 Telephone
(850) 222-5605 Telefax

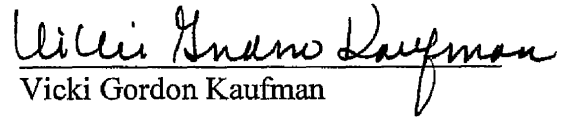
Attorneys for Covad Communications
Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing DIECA Communications, Inc. d/b/a Covad Communications Company's Request For Specified Confidential Classification and Motion For Protective Order has been furnished by (*) hand delivery this 10th day of July, 2001, to the following:

(*)Felicia Banks
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

(*) Michael Twomey
c/o Nancy Sims
150 S. Monroe Street
Suite 400
Tallahassee, Florida 32301


Vicki Gordon Kaufman

ATTACHMENT A

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF COVAD'S
ORDER AND TROUBLE TICKET INFORMATION
DOCKET NO. 001797-TP**

Explanation of Proprietary Information

1. The information provided contains Covad-specific order information, such as the number of orders submitted. Public disclosure of this information would be harmful to Covad's competitive interests as it would give other competitors insight into Covad's on-going business affairs. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary, confidential business information which is exempt from section 119.07(1) and section 24(a), Art. 1 of the State Constitution.
2. The information provided contains customers' telephone numbers which Covad is prohibited from disclosing pursuant to section 364.24(2), Florida Statutes, which prohibits the disclosure of customer account records.

<u>Page No.</u>	<u>Line</u>	<u>Reason</u>
1	1 - 22	1
2	1 - 10	2
3	2 - 19	2
4	1 - 8	2

ATTACHMENT B

**Covad Communication Company's
Response to Staff's Second Request to Produce**

POD No. 8

CONFIDENTIAL

CONFIDENTIAL

1
2
3
4
5
6
7
8
9
10



36% of all Bell South Orders in Florida that receive a FOC require more than one FOC

11
12
13

Orders receiving FOCs
FOCs
FOCs per Order

Due to multiple FOC slides (changes) on individual Orders, Bell South orders receive 1.55 FOCs per order

14 Note: [redacted] orders successfully placed with Bell South never received a FOC and were cancelled.

15
16
17
18
19
20
21
22

Orders	FOCs	%
1 FOC		63.99%
2 or more FOCs		36.01%
3 or more FOCs		12.10%
4 or more FOCs		4.39%
5 or more FOCs		1.70%
6 or more FOCs		0.58%
7 or more FOCs		0.24%
8 or more FOCs		0.12%

Greater than 12% (12.10) of Bell South Orders receive 3 or more FOCs, with 10 orders receiving 8 or more FOCs

**Covad Communication Company's
Response to Staff's Second Request to Produce**

POD No. 10

CONFIDENTIAL

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #
1	5/3/01	952881 c03470698		20001219	Cmplt	c20	#####
2	5/3/01	612861 c80884613-b		20010510	Cmplt	c20	#####
3	5/3/01	651690 c81004933		20010413	Cmplt	c20	998451
4	5/3/01	612331 c81144012-b		20010507	Cmplt	c20	1034164
5	5/3/01	612870 c81163252		20010503	Cmpit	c20	1033300SL
6	5/3/01	612330 c81164554		20010503	Cmplt	c20	#####
7	5/3/01	612870 c81164686		20010503	Cmplt	c20	1044912
8	5/3/01	612721 c81172979-a		20010504	Cmplt	c20	1034268SL
9	5/3/01	952474 c90870035		20010507	Cmplt	c20	1036220
10	5/3/01	763553 c90950865		20010410	Cmplt	c20	#####

CONFIDENTIAL

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #
5/3/01	503240	c47498990-b			Cmplt	c20	969922SL
2 5/3/01	206232	c50639705		20010503	Cmplt	c20	1038075SL
3 5/3/01	503635	c50646698		20010503	Cmplt	c20	1036300SL
4 5/3/01	503231	c50658052-b		20010503	Cmplt	c20	1037318SL
5 5/3/01	503231	c50660483		20010503	Cmplt	c20	1037383SL
6 5/3/01	360373	c50669507		20010501	Cmplt	c20	1025867
7 5/3/01	206441	c50703083		20010503	Cmplt	c20	#####
8 5/3/01	206322	c50804087		20010501	Cmplt	c20	1037978SL
9 5/3/01	360456	c50806795		20010503	Cmplt	c20	1037666SL
10 5/3/01	503252	c50816383		20010503	Cmplt	c20	1037969SL
11 5/3/01	206522	c50872807		20010503	Cmplt	c20	#####
12 5/3/01	503771	c50903587		20010503	Cmplt	c20	#####
13 5/3/01	503231	c50910434		20010504	Cmplt	c20	#####
14 5/3/01	206322	c50939965		20010504	Cmplt	c20	1048682
15 5/3/01	206782	c51029096		20010503	Cmplt	c20	1033763
16 5/3/01	206522	c51063865-a		20010508	Cmplt	c20	1052982SL
17 5/3/01	360373	c51090731		20010508	Cmplt	c20	1049923
18 5/3/01	206522	c51189892		20010509	Cmplt	c20	1057003SL
19 5/3/01	206322	d50621167		20010430	Cmplt	c20	#####



CONFIDENTIAL
 (S)

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #
1	5/3/01	505522 c50256412-b	[REDACTED]	20010503	Cmplt	c20	1022890SL
2	5/3/01	505662 c50666720-a	[REDACTED]	20010503	Cmplt	c20	1032822SL
3	5/3/01	520296 c50740380	[REDACTED]	20010502	Cmplt	c20	1031141SL
4	5/3/01	435649 c50769154	[REDACTED]	20010502	Cmplt	c20	1026135
5	5/3/01	801773 c50772446	[REDACTED]	20010503	Cmplt	c20	1044204
6	5/3/01	480894 c50802683-b	[REDACTED]	20010503	Cmplt	c20	1043711
7	5/3/01	623931 c50937131-a	[REDACTED]	20010503	Cmplt	c20	#####
8	5/3/01	480894 c51044912	[REDACTED]	20010503	Cmplt	c20	1034500

CONFIDENTIAL

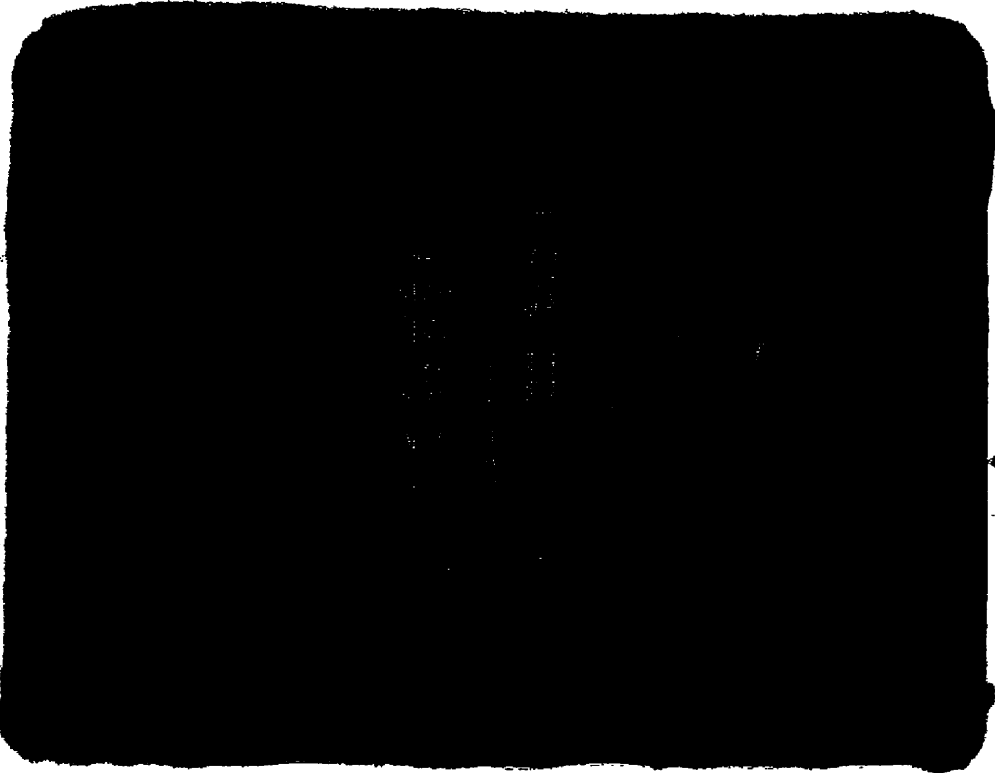
**Covad Communication Company's
Response to Staff's Second Request to Produce**

POD No. 8

CONFIDENTIAL

CONFIDENTIAL

2
3
4
5
6
7
8
9
10



36% of all Bell South Orders in Florida that receive a FOC require more than one FOC.

11
12
13

Orders receiving FOCs
OCs
FOCs per Order

Due to multiple FOC slides (changes) on individual orders, Bell South orders receive 1.55 FOCs per order.

Note: [redacted] orders successfully placed with Bell South never received a FOC and were cancelled.

15
16
17
18
19
20
21
22

Orders	FOCs	%
1 FOC		63.99%
2 or more FOCs		36.01%
3 or more FOCs		12.10%
4 or more FOCs		4.39%
5 or more FOCs		1.70%
6 or more FOCs		0.58%
7 or more FOCs		0.24%
8 or more FOCs		0.12%

Greater than 12% (12.10) of Bell South Orders receive 3 or more FOCs, with 10 orders receiving 8 or more FOCs.

**Covad Communication Company's
Response to Staff's Second Request to Produce**

POD No. 10

CONFIDENTIAL

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #
1	5/3/01	952881 c03470698		20001219	Cmplt	c20	#####
2	5/3/01	612861 c80884613-b		20010510	Cmplt	c20	#####
3	5/3/01	651690 c81004933		20010413	Cmplt	c20	998451
4	5/3/01	612331 c81144012-b		20010507	Cmplt	c20	1034164
5	5/3/01	612870 c81163252		20010503	Cmplt	c20	1033300SL
6	5/3/01	612330 c81164554		20010503	Cmplt	c20	#####
7	5/3/01	612870 c81164686		20010503	Cmplt	c20	1044912
8	5/3/01	612721 c81172979-a		20010504	Cmplt	c20	1034268SL
9	5/3/01	952474 c90870035		20010507	Cmplt	c20	1036220
10	5/3/01	763553 c90950865		20010410	Cmplt	c20	#####

CONFIDENTIAL

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #	
	5/3/01	503240	c47498990-b		Cmplt	c20	969922SL	
2	5/3/01	206232	c50639705		20010503	Cmplt	c20	1038075SL
3	5/3/01	503635	c50646698		20010503	Cmplt	c20	1036300SL
4	5/3/01	503231	c50658052-b		20010503	Cmplt	c20	1037318SL
5	5/3/01	503231	c50660483		20010503	Cmplt	c20	1037383SL
6	5/3/01	360373	c50669507		20010501	Cmplt	c20	1025867
7	5/3/01	206441	c50703083		20010503	Cmplt	c20	#####
8	5/3/01	206322	c50804087		20010501	Cmplt	c20	1037978SL
9	5/3/01	360456	c50806795		20010503	Cmplt	c20	1037666SL
10	5/3/01	503252	c50816383		20010503	Cmplt	c20	1037969SL
11	5/3/01	206522	c50872807		20010503	Cmplt	c20	#####
12	5/3/01	503771	c50903587		20010503	Cmplt	c20	#####
13	5/3/01	503231	c50910434		20010504	Cmplt	c20	#####
14	5/3/01	206322	c50939965		20010504	Cmplt	c20	1048682
15	5/3/01	206782	c51029096		20010503	Cmplt	c20	1033763
16	5/3/01	206522	c51063865-a		20010508	Cmplt	c20	1052982SL
17	5/3/01	360373	c51090731		20010508	Cmplt	c20	1049923
18	5/3/01	206522	c51189892		20010509	Cmplt	c20	1057003SL
19	5/3/01	206322	d50621167		20010430	Cmplt	c20	#####

CONFIDENTIAL

Report Date	NPA/NXX	Order #	TN	Due Date	Pending/CP	rsid	PON #
1 5/3/01	505522	c50256412-b	[REDACTED]	20010503	Cmplt	c20	1022890SL
2 5/3/01	505662	c50666720-a	[REDACTED]	20010503	Cmplt	c20	1032822SL
3 5/3/01	520296	c50740380	[REDACTED]	20010502	Cmplt	c20	1031141SL
4 5/3/01	435649	c50769154	[REDACTED]	20010502	Cmplt	c20	1026135
5 5/3/01	801773	c50772446	[REDACTED]	20010503	Cmplt	c20	1044204
6 5/3/01	480894	c50802683-b	[REDACTED]	20010503	Cmplt	c20	1043711
7 5/3/01	623931	c50937131-a	[REDACTED]	20010503	Cmplt	c20	#####
8 5/3/01	480894	c51044912	[REDACTED]	20010503	Cmplt	c20	1034500

CONFIDENTIAL

ATTACHMENT C
CONFIDENTIAL DOCUMENTS