

ORIGINAL

Fred Goodwin  
Associate Director-Regulatory

SBC Telecom, Inc.  
1010 N. St. Mary's Street  
Room 13-34  
San Antonio, TX 78215  
Phone: 210-246-8755  
Fax: 210-246-8759  
Email: fg8578@sbc.com



December 2, 2003

Blanco Bayo  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
03 DEC -3 AM 10:36  
COMMISSION  
CLERK

**RE: Request for Confidential Classification: response of SBC Telecom to Staff's requests for information in Docket Nos. 030851-TP and 030852-TP**

Dear Ms. Bayo:

Enclosed is the response of SBC Telecom, Inc. (SBCT) to the staff's requests for information in the above-referenced proceedings

Two copies of the public (redacted) version of SBCT's response are enclosed, as well as one copy of the confidential version (unredacted). Also enclosed are electronic copies of both the public and confidential versions.

Attached are two affidavits: the first attests to the accuracy of SBCT's responses to the Staff's requests for information; the second attests to the confidential nature of the information provided in those responses.

Please call me if you have any questions or need additional information.

Sincerely,

*Fred Goodwin*  
Fred Goodwin  
Associate Director-Regulatory

Attachments  
CC: Pat Lee

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 1
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH cc: info records

*1 copy to each docket*

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 12280-03. The document is in locked storage pending advice on handling. To access the material, your name must be on the CASR. If undocketed, your division director must obtain written EXD/Tech permission before you can access it.

DOCUMENT NUMBER-DATE  
12279 DEC-3 03  
FPSC-COMMISSION CLERK

**VERIFICATION UNDER OATH  
REGARDING CONFIDENTIALITY OF RESPONSE OF SBC TELECOM, INC.  
TO THE DATA REQUEST OF THE FLORIDA PSC STAFF**

I, Fred Goodwin, state and attest that the attached response (Response) to the data requests of the Florida Public Service Commission (PSC) Staff is filed on behalf of SBC Telecom, Inc. (SBCT) as required by Florida PSC rules.

Further, that the information asserted to be highly sensitive confidential information (customer addresses, customer counts and locations, collocation locations, switch capacities, and transport provisioning and capacities), is "proprietary confidential business information" within the meaning of F.S. 364.183(3)(e).

That the highly sensitive confidential information specifically comprises "information relating to competitive interests, the disclosure of which would impair the competitive business" of SBCT.

That disclosure of this highly sensitive confidential information would provide competitors valuable information about the geographic scope of SBCT's operations and service offerings that is not publicly available.

That such disclosure would allow competitors to unfairly target SBCT's customers and operations.

That the highly sensitive confidential information is intended to be, and is treated by SBCT as, private and has not been disclosed to the public.

That the highly sensitive confidential information is held as confidential within the Company, with limited access to and distribution of the information.

That the information asserted to be highly sensitive confidential information is in fact bona fide proprietary confidential business information.

And finally that highly sensitive confidential information contained in said Response has been prepared and presented in accordance with all applicable Florida Statutes, Commission Rules, and Commission Orders.

Fred Goodwin  
Signature of Person Making Verification

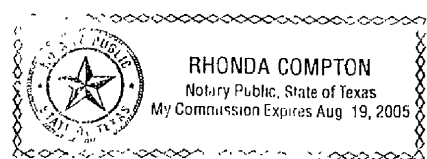
Assoc. Dir - Regulatory  
Job Title

Dec 2, 2003  
Date

Subscribed and sworn before me this the 2nd day of December, 2003.

Rhonda Compton  
Notary Public

My Commission Expires: \_\_\_\_\_



**AFFIDAVIT**

By my signature below, I, Fred Goodwin, attest to the accuracy of the information contained herein and the attached documents. I have reviewed the foregoing and declare that, to the best of my knowledge and belief, the information is true and correct. I attest that I have the authority to sign on behalf of SBC Telecom, Inc. (SBCT).

**Further, I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."**

Fred Goodwin  
Print Name

Fred Goodwin  
Signature of Person Making Verification

Title: Associate Director-Regulatory

Date: December 2, 2003

Telephone No.: 210-246-8755

Fax No.: 210-246-8759

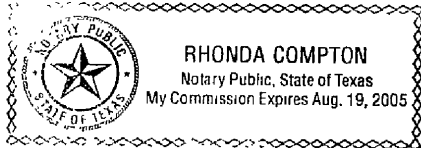
Utility: SBC Telecom, Inc.

Address: 1010 N. St. Mary's, Room 1334, San Antonio, TX 78215

STATE OF TEXAS

COUNTY OF BEXAR

Sworn (or affirmed) and subscribed before me this 2<sup>nd</sup> day of December, 2003, by Rhonda Compton.



Rhonda Compton  
(Signature of Notary Public)

(NOTARY SEAL)

(name of Notary, Typed, Printed, or Stamped)

Personally Known  OR Produced Identification \_\_\_\_\_ Type of Identification Produced \_\_\_\_\_

general\_SBCT\_FL.xls  
General

	A	B	C	D	E
1	Please enter the information requested below in column B in reference to your company				
2	FPSC CODE	TX309	The FPSC code should be on the address label used to send the paper copies of this data request to you.		
3	Company Name, as it appears on your provider's certificate	SBC Telecom, Inc.	Use the company name that appears on the address label, as well.		
4	OCN from LERG	2665			
5	OCN Name from LERG				
6	Category (CLEC, ILEC, WIRELESS)	CLEC			
7	AOCN from LERG (administrative)		Continue with additional affiliations or DBA Names down the columns -->		
8	FLPSC code for Affiliations				
9	DBA Names				
10	If you do not provide service or are providing service only via resale in Florida, please enter "No Service" and return this information.				
11					
12					
13					
14	Please continue with the data request. We appreciate the time required to complete it.				

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG															
1	Self-Providers														Wholesalers																																	
2	Customer Information					High-Capacity Loop Type		Number of circuits								High-Capacity Loop Type		Number of circuits																														
3	Street Address	City	Zip	Wire Center CLI	Self-Provider? (Y/N)	Dark Fiber? (X or blank)	DS17 (X or blank)	DS37 (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Wholesaler? (Y/N)	Dark Fiber? (X or blank)	DS17 (X or blank)	DS37 (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Point-to-Point (P) or Ring (R) configuration	Accessible? (Y/N)	Sole Access? (Y/N)	Using? (Y/N)	Giving? (Y/N)	Owner? (Y/N)	Loop Owner?	Loop Wholesaler?	Nature of agreement?															
4	The information requested is highly sensitive confidential and will be provided subject to a protective agreement																																															
5																																																
6																																																

remote\_switches\_SBCT\_FL.xls  
 Remote Switch Addresses

	A	B	C	D	E	F	G	H
1	<b>Please list all of your remote switches. Any switches located at the central office, do not need to be added.</b>							
2	Switch CLI	Host CLI	Vertical Coord- inates	Horiz- ontal Coord- inates	Switch Street Address	City	State	Zip
3								
4	None							

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1			Type of Switch (X or Blank)																		Y or N										
2	Wire Center CLLI	Switch CLLI	End Office	Tandem Office	Multi-Function	Remote Line	Packet	Brogeband	Other	# of VG provisioned	# of VG in use	Capacity (CCS)	# of Residential	# of Customers with 1 to 3 lines	# of Customers with 4 to 8 lines	# of Customers with 9 lines or more	# Voice only	# Data Service Only	# Voice and Data	Owner?	Wholesaler?	Self-Provider?	FPSC code of Owner	FPSC code of Leasor	Nature of the arrangement	Equipment Type	Define Abbreviations	Function Performed	Class 4 and Class 5 Functions? (Y/N)	NPA-NXX	
3	The information requested is highly sensitive confidential and will be provided subject to a protective agreement																														
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2	FROM ILEC											TO ILEC											TRANSPORT ROUTE																	
3	Central Office Address											Central Office Address											Self-Providers											Wholesalers						
4	CLI	Street Address	City	State	Zip	Vertical Coordination?	Horizontal Coordination?	Capex? (Y/N)	Opex? (Y/N)	Virtual? (Y/N)	CLI	Street Address	City	State	Zip	Horizontal Coordinates	Capex? (Y/N)	Opex? (Y/N)	Virtual? (Y/N)	Type	Number of transport circuits					Carrier?	Type	Number of transport circuits												
5	The information requested is highly sensitive confidential and will be provided subject to a protective agreement																																							
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