

ORIGINAL

**McWHIRTER REEVES**  
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

December 31, 2003

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**VIA HAND DELIVERY**

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

Re: Docket No.: 030852-TP

Dear Ms. Bayo:

On behalf of Network Telephone Corporation (Network Telephone), enclosed for filing and distribution is the original and 15 copies of the following:

- 13646-03 *Claim* Network Telephone Corporation's Claim of Confidentiality for its Responses to Staff's First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7)
- 13647-03 *Confidential*

Also enclosed for filing and distribution is the original and 1 copy of the following:

- 13648-03 Notice of Service of Network Telephone Corporation's Responses to Staff's First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7)

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

Sincerely,

*Joe McGlothlin*

Joseph A. McGlothlin

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*Sh*  
FPSC-BUREAU OF RECORDS

This claim of confidentiality was filed by or on behalf of a "telco" for Confidential DN 13647-03. 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 NO. DATE  
13646-03 12/31/03  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising  
From Federal Communications Commission's  
Triennial UNE review; Location-Specific  
Review for DS1, DS3 and Dark Fiber Loops,  
And Route-Specific Review for DS1, DS3 and  
Dark Fiber Transport.

Docket No. 030852-TP

Filed: December 31, 2003

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**NETWORK TELEPHONE CORPORATION'S CLAIM OF CONFIDENTIALITY  
FOR ITS RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-14)  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-7)**

Pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Network Telephone Corporation ("Network Telephone"), files this Claim of Confidentiality.

1. On December 11, 2003, Staff served Network Telephone with its First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7).
2. Network Telephone is serving its responses to such discovery today. Certain of its responses contain confidential proprietary business information as defined in Section 364.183, Florida Statutes. Network Telephone has flagged the confidential, proprietary information within its responses. The information consists of a confidential spreadsheet provided in response to Interrogatory No. 5 and a confidential diagram provided in response to Interrogatory No. 1(a).
3. As provided in Section 364.183, Florida Statutes, Network Telephone asserts a claim of confidentiality as to the proprietary information.

DOCUMENT NUMBER-DATE

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*Joseph A. McGlothlin*

Joseph A. McGlothlin

McWhirter, Reeves, McGlothlin, Davidson,  
Kaufman & Arnold, P.A.

117 South Gadsden Street

Tallahassee, Florida 32301

(850) 222-2525

(850) 222-5606 (fax)

[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)

Attorneys for Network Telephone Corporation

## CERTIFICATE OF SERVICE

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Network Telephone Corporation's Claim of Confidentiality for its Responses to Staff's First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-7) has been provided by (\*) hand delivery, (\*\*)email and U.S. Mail this 31st day of December 2003, to the following:

(\*)(\*\*)Adam Teitzman, Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

(\*\*) Tracy Hatch  
AT&T Communications of the  
Southern States, LLC  
101 North Monroe Street  
Suite 700  
Tallahassee, Florida 32301

(\*\*) Nancy White  
c/o Nancy Sims  
BellSouth Telecommunications, Inc.  
150 South Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

(\*\*) Michael Gross  
Florida Cable Telecommunications  
246 East 6<sup>th</sup> Avenue  
Tallahassee, Florida 32302

(\*\*) Richard Chapkis  
Verizon Florida, Inc.  
201 North Franklin Street  
MC: FLTC0717  
Tampa, Florida 33602

(\*\*) Matthew Feil  
Florida Digital Network, Inc.  
390 North Orange Avenue, Suite 2000  
Orlando, Florida 32801

(\*\*) Susan Masterton  
Sprint Communications Company  
1313 Blairstone Road  
Post Office Box 2214  
MC: FLTLHO0107  
Tallahassee, Florida 32301

(\*\*) Jeffrey J. Binder  
Allegiance Telecom, Inc.  
1919 M Street, NW  
Washington, DC 20037

(\*\*) Donna Canzano McNulty  
MCI WorldCom  
1203 Governors Square Boulevard  
Suite 201  
Tallahassee, Florida 32301

(\*\*) Floyd R. Self  
Messer, Caparello & Self  
215 South Monroe Street, Suite 701  
Tallahassee, FL 32301

(\*\*) Norman H. Horton, Jr.  
215 South Mornoe Street  
Tallahassee, Florida 32302-1876

(\*\*) Nanette Edwards  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, Alabama 35802

(\*\*) Jake E. Jennings  
Senior Vice-President  
Regulatory Affairs & Carrier Relations  
NewSouth Communications Corp.  
NewSouth Center  
Two N. Main Center  
Greenville, SC 29601

(\*\*) Bo Russell  
Vice-President  
Regulatory and legal Affairs  
NuVox Communications, Inc.  
301 North Main Street  
Greenville, SC 29601

(\*\*) Jon C. Moyle, Jr.  
Moyle, Flanigan, Katz, Raymond  
& Sheehan, P.A.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301

(\*\*) Rand Currier  
Geoff Cookman  
Granite Telecommunications, LLC  
234 Copeland Street  
Quincy, MA

(\*\*) Andrew O. Isar  
Miller Isar, Inc.  
2901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335

(\*\*) Scott A. Kassman  
FDN Communications  
390 North Orange Avenue  
Suite 2000  
Orlando, FL 32801

(\*\*) Rabinai Carson  
Xspedius Communications  
5555 Winghaven Blvd., Suite 3000  
O'Fallon, MO 63366-3868

  
Joseph A. McGlothlin