

9201 Central Expressway  
March 17, 2004 Dallas, TX 75231  
469/259-9123 fax

Ms. Blanca Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
MAR 18 AM 10:20  
COMMISSION  
CLERK

Re: Docket No. 030851-TP

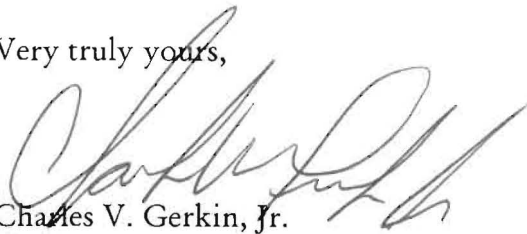
Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Allegiance Telecom of Florida, Inc.'s Request for Specified Confidential Classification for confidential discovery responses that were entered into the record of this docket at the hearing on February 24, 2004, together with one highlighted copy of each document containing confidential information, each in a sealed envelope, and two redacted copies of each document containing confidential information.

Also enclosed is an extra copy of this letter. Please acknowledge receipt of this transmittal by date-stamping the extra copy and returning it to the undersigned in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this matter.

Very truly yours,

  
Charles V. Gerkin, Jr.

CVG/s  
Enclosures  
cc: Parties of Record (VIA e-mail)

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL   
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC   
OTH  *conf records*

This confidentiality request was filed by or for a "telco" for DN 03627-04 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.

*03629-04; 03631-04; 0363304;  
03635-04; 03637-04*

DOCUMENT NUMBER-DATE

*03625* MAR 18 3

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:  IMPLEMENTATION OF REQUIREMENTS ARISING FROM FEDERAL COMMUNICATIONS COMMISSION TRIENNIAL UNE REVIEW: LOCAL CIRCUIT SWITCHING FOR MASS MARKET CUSTOMERS	Docket No. 030851-TP  Filed: March 17, 2004
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ALLEGIANCE TELECOM OF FLORIDA, INC.'S  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

ALLEGIANCE TELECOM OF FLORIDA, INC. ("Allegiance"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, hereby files its Request for Specified Confidential Classification.

1. On November 5, 2003, Allegiance filed notice that it had served its Confidential Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories. Allegiance's Responses contain confidential information that is considered proprietary. On February 24, 2003, at the hearing in the above-captioned docket, Allegiance's Responses to BellSouth's First Set of Interrogatories were entered into the record as part of Exhibit 2, but Allegiance has been unable to determine whether this or any other Exhibit included its Confidential Responses and is requesting confidential classification of those Confidential Responses out of an abundance of caution.

2. On December 3, 2003, Allegiance filed its Responses to the Commission Staff's Data Request issued on November 12, 2003, in connection with the above-captioned docket and in connection with Docket No. 030852-TP. One of the Excel spreadsheets comprising

DOCUMENT NUMBER-DATE

03625 MAR 18 04

FPSC-COMMISSION CLERK

Allegiance's Response to the Staff Data Request contains confidential information that is considered proprietary. Allegiance filed a Claim of Confidentiality that same day. On February 24, 2003, at the hearing in the above-captioned docket, Allegiance's Confidential Response to the Staff Data Request was entered into the record as part of Exhibit 11, identified as Document No. 12525-03.

3. On December 10, 2003, Allegiance filed Corrected Responses to Questions 7 and 33 of BellSouth Telecommunications, Inc.'s First Set of Interrogatories. Those Corrected Responses contain confidential information that is considered proprietary. Allegiance filed a Claim of Confidentiality that same day. On February 24, 2003, at the hearing in the above-captioned docket, those Confidential Corrected Responses were entered into the record as part of Exhibit 12, identified as Document No. 12733-03.

4. On December 15, 2003, Allegiance filed its Responses to the Staff's First Set of Interrogatories. Allegiance's Response to Question 4(a) contains confidential information that is considered proprietary. Allegiance filed a Claim of Confidentiality that same day. On February 24, 2003, at the hearing in the above-captioned docket, Allegiance's Confidential Response to Question 4(a) of the Staff's First Set of Interrogatories was entered into the record as part of Exhibit 12, identified as Document No. 12993-03.

5. On December 31, 2003, Allegiance filed its Responses to Sprint Florida Inc. and Sprint Communications Company, L.P.'s First Set of Interrogatories. Allegiance's Responses to Sprint's First Set of Interrogatories contains confidential information that is considered proprietary. Allegiance filed a Claim of Confidentiality that same day. On February 24, 2003, at the hearing in the above-captioned docket, Allegiance's Confidential Responses to Sprint's

First Set of Interrogatories were entered into the record as part of Exhibit 12, identified as Document No. 13630-03.

6. On February 24, 2004, Allegiance filed its Responses to Staff's Third Set of Interrogatories. Allegiance's Responses to Staff's Third Set of Interrogatories contain confidential information that is considered proprietary. Allegiance filed a Claim of Confidentiality that same day. On February 24, 2003, at the hearing in the above-captioned docket, Allegiance's Confidential Responses to Staff's Third Set of Interrogatories were entered into the record as part of Exhibit 99, identified as Document No. 02683-04.

7. Allegiance hereby files this Request for Specified Confidential Classification because the information contained in the items identified in paragraphs 1-6 contain confidential business information that is proprietary to Allegiance. A more specific description of this information is contained in Attachments A-1 through A-6. Public disclosure of this information would cause competitive harm to Allegiance and provide competitors with an unfair advantage in future negotiations. The information discussed in this Request for Specified Confidential Classification is valuable, and Allegiance strives to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary information pursuant to Section 364.24 and Section 364.183, Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

8. Attachments A-1 through A-6 to Allegiance's Request for Confidential Classification contain explanations of the proprietary information along with lists that identify the location of the information designated by Allegiance as confidential.

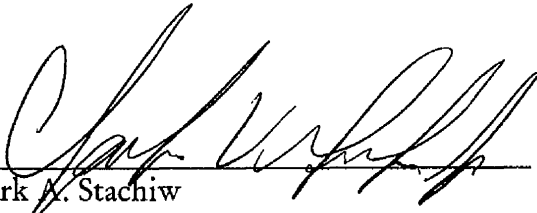
9. Attachments B-1 through B-6 to Allegiance's Request for Confidential Classification are redacted copies of the documents containing the confidential information.

10. Attachments C-1 through C-3 to Allegiance's Request for Confidential Classification are highlighted copies of the documents containing the confidential information.

11. The information discussed in this Request for Specified Confidential Classification is valuable, Allegiance treats this information as confidential in all requests, and this information has not been generally disclosed.

12. The original of this Request was filed today with the Division of the Commission Clerk and Administrative Services and a copy was served on the Parties.

WHEREFORE, based on the foregoing, Allegiance 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.



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Attorneys for ALLEGIANCE TELECOM OF  
FLORIDA, INC.

Allegiance Telecom of Florida, Inc.  
 Florida PSC Docket No. 030851-TP  
 Request for Confidential Classification  
 March 17, 2004  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S  
 CONFIDENTIAL RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
 FIRST SET OF INTERROGATORIES  
 SERVED NOVEMBER 5, 2003 IN FPSC DOCKET NO. 030851-TP

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Response to Question 5	
Page 1 of Response, lines 20-38	1
Page 2 of Response, lines 1-21	1
Response to Question 6	
Page 1 of Response, lines 13-35	1
Page 2 of Response, lines 1-18	1
Response to Question 7	
Lines 10-23	1
Response to Question 13	
Lines 10-23	1
Response to Question 33	
Line 15	1
Response to Question 50	
Numerical value in line 12	1
Numerical value in line 14	1
Numerical value in line 15	1
Response to Question 51(i)	
Numerical value in line 10	1
Numerical value in line 11	1
Numerical value in line 13	1
Numerical value in line 14	1

Allegiance Telecom of Florida, Inc.  
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Request for Confidential Classification  
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Page 1

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S  
RESPONSE TO STAFF DATA REQUEST  
FILED DECEMBER 3, 2003, IN FPSC DOCKET NO. 030851-TP

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Excel Spreadsheet switching_Allegiance_Telecom_FL.xls	
Rows 4-422, columns B-AF <sup>1</sup>	1
Row 425, Column A	1

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<sup>1</sup> Allegiance requests confidential classification of cells in which there is no data, as well as cells containing data, because some of the confidential information in the cells containing data can be ascertained by analyzing the cells that do not contain data.

Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S  
CORRECTED RESPONSES TO QUESTIONS 7 AND 33 OF  
BELL SOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 10, 2003 IN FPSC DOCKET NO. 030851-TP

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Revised Response to Question 7 Table on third and fourth pages, all fields	1
Revised Response to Question 33 Line 22	1



**Allegiance Telecom of Florida, Inc.**  
**Florida PSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**March 17, 2004**  
**Page 1**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S**  
**RESPONSE TO QUESTION 4(A) OF**  
**STAFF'S FIRST SET OF INTERROGATORIES**  
**FILED DECEMBER 15, 2003 IN FPSC DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Field labeled "Jan '01"	1
Field labeled "Feb '01"	1
Field labeled "Mar '01"	1
Field labeled "Apr '01"	1
Field labeled "May '01"	1
Field labeled "Jun '01"	1
Field labeled "Jul '01"	1
Field labeled "Aug '01"	1
Field labeled "Sep '01"	1
Field labeled "Oct '01"	1
Field labeled "Nov '01"	1
Field labeled "Dec '01"	1
Field labeled "Total"	1
Field labeled "Jan '02"	1
Field labeled "Feb '02"	1
Field labeled "Mar '02"	1
Field labeled "Apr '02"	1
Field labeled "May '02"	1
Field labeled "Jun '02"	1
Field labeled "Jul '02"	1
Field labeled "Aug '02"	1
Field labeled "Sep '02"	1
Field labeled "Oct '02"	1
Field labeled "Nov '02"	1
Field labeled "Dec '02"	1
Field labeled "Total"	1

ATTACHMENT A-4

Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification

March 17, 2004

Page 2

Field labeled "Jan '01"	1
Field labeled "Feb '03"	1
Field labeled "Mar '03"	1
Field labeled "Apr '03"	1
Field labeled "May '03"	1
Field labeled "Jun '03"	1
Field labeled "Jul '03"	1
Field labeled "Aug '03"	1
Field labeled "Sep '03"	1
Field labeled "Oct '03"	1
Field labeled "Total"	1

**Allegiance Telecom of Florida, Inc.**  
**Florida PSC Docket No. 030851-TP**  
**Request for Confidential Classification**  
**March 17, 2004**  
**Page 1**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S  
RESPONSES TO SPRINT'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 31, 2003 IN FPSC DOCKET NO. 030851-TP**

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Excel Spreadsheet	
Row 5, Columns M, N	1
Row 6, Columns M, N, P, Q, R, S, T	1
Row 7, Columns M, N, P, Q, R, S, T	1
Row 8, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 9, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 10, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 13, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 15, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 16, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 17, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 18, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 19, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 20, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 21, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 22, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 23, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 24, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 25, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 27, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 28, Columns B, C, D, E, F, G, H, I, J, K, L, O	1
Row 29, Columns B, C, D, E, F, G, H, I, J, K, L, O	1

Allegiance Telecom of Florida, Inc.  
 Florida PSC Docket No. 030851-TP  
 Request for Confidential Classification  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF ALLEGIANCE'S  
 RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES  
 FILED FEBRUARY 24, 2004 IN FPSC DOCKET NO. 030851-TP

**Explanation of Proprietary Information**

1. This information contains business information related to competitive interests of Allegiance that is proprietary to Allegiance. Disclosure of this data would impair the competitive business and cause harm to Allegiance. 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.

<b>Location</b>	<b>Reason</b>
Response to Question 12	
First page of Response	
Line 21	1
Line 23	1
Line 25	1
Second page of Response	
Line 4	1
Line 6	1
Line 8	1
Line 10	1
Line 12	1
Line 14	1
Line 15	1
Line 16	1
Lines 18-28	1
Third page of Response	
Lines 3-24	1
Lines 28-31	1
Response to Question 14	
First page of Response	
Line 9	1
Line 11	1
Line 13	1
Line 14	1
Line 15	1

ATTACHMENT A-6

Allegiance Telecom of Florida, Inc.  
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Location	Reason
Response to Question 14 (cont.) First page of Response (cont.) Lines 17-36	1
Response to Question 16 First page of Response Line 10	1
Line 11	1
Line 12	1
Line 13	1
Line 14	1
Line 15	1
Lines 19-20	1

**ATTACHMENT B-1**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**REDACTED COPY OF ALLEGIANCE'S  
CONFIDENTIAL RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES  
SERVED NOVEMBER 5, 2003 IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT B-2**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**REDACTED COPY OF ALLEGIANCE'S  
RESPONSE TO STAFF DATA REQUEST  
FILED DECEMBER 3, 2003, IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT B-4**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**REDACTED COPY OF ALLEGIANCE'S  
RESPONSE TO QUESTION 4(A) OF  
STAFF'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 15, 2003 IN FPSC DOCKET NO. 030851-TP**



**ATTACHMENT B-5**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**REDACTED COPY OF ALLEGIANCE'S  
RESPONSES TO SPRINT'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 31, 2003 IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT B-6**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**REDACTED COPY OF ALLEGIANCE'S  
RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES  
FILED FEBRUARY 24, 2004 IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT C-1**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**HIGHLIGHTED COPY OF ALLEGIANCE'S  
CONFIDENTIAL RESPONSES TO BELL SOUTH TELECOMMUNICATIONS, INC.'S  
FIRST SET OF INTERROGATORIES  
SERVED NOVEMBER 5, 2003 IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT C-2**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**HIGHLIGHTED COPY OF ALLEGIANCE'S  
RESPONSE TO STAFF DATA REQUEST  
FILED DECEMBER 3, 2003, IN FPSC DOCKET NO. 030851-TP**

ATTACHMENT C-3

Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004

HIGHLIGHTED COPY OF ALLEGIANCE'S  
CORRECTED RESPONSES TO QUESTIONS 7 AND 33 OF  
BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SET OF INTERROGATORIES

**ATTACHMENT C-4**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**HIGHLIGHTED COPY OF ALLEGIANCE'S  
RESPONSE TO QUESTION 4(A) OF  
STAFF'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 15, 2003 IN FPSC DOCKET NO. 030851-TP**

ATTACHMENT C-5

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**HIGHLIGHTED COPY OF ALLEGIANCE'S  
RESPONSES TO SPRINT'S FIRST SET OF INTERROGATORIES  
FILED DECEMBER 31, 2003 IN FPSC DOCKET NO. 030851-TP**

**ATTACHMENT C-6**

**Allegiance Telecom of Florida, Inc.  
Florida PSC Docket No. 030851-TP  
Request for Confidential Classification  
March 17, 2004**

**HIGHLIGHTED COPY OF ALLEGIANCE'S  
RESPONSES TO STAFF'S THIRD SET OF INTERROGATORIES  
FILED FEBRUARY 24, 2004 IN FPSC DOCKET NO. 030851-TP**