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March 19, 2004

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COMMISSION
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Ms. Blanca Bayó, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of ITC^DeltaCom Communications, Inc. are an original and fifteen copies of ITC^DeltaCom Communications, Inc.'s Request for Confidential Classification for information provided in Response to the 2003 TRO Data Request in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Mona M. Gaus
for Floyd R. Self

This confidentiality request was filed by or for a "telco" for DN 12888-03. 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.

AUS _____ ERS/amb
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(for 12888-03)
DOCUMENT NUMBER-DATE
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching).
for Mass Market Customers) Filed: March 19, 2004
_____)

ITC^DELTA COM COMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine and BTI Corporation (hereinafter "ITC^DeltaCom"), pursuant to section 364.183, Florida Statutes, and Rule 25-2.006, Florida Administrative Code, requests confidential classification of certain data previously filed in this docket pursuant to a claim for confidentiality. In support of this request ITC^DeltaCom hereby states:

1. On December 11, 2003, ITC^DeltaCom filed in the above-captioned proceeding its Response to the 2003 TRO Data Request. Responses included Confidential Responses in the areas of Loop, Switching, Transport and Remote Switches, all of which contained confidential information that is considered proprietary. When ITC^DeltaCom filed its Response, it filed the appropriate corresponding Claim for Confidential Treatment, in accordance with Rule 25-22.006(5) and section 364.183(1), Florida Statutes, regarding ITC^DeltaCom's Response to the 2003 TRO Data Request, and specifically Responses in the areas of Loop, Switching, Transport and Remote Switches.

2. ITC^DeltaCom hereby files this Request for Confidential Classification, in accordance with Rule 25-22.006(4), Florida Administrative Code, for its Confidential Responses in the areas of Loop Response, Switching Response, Transport Response and Remote Switches Response. The public and redacted copies required by Rule 25-22.006(4) are not being filed at this time as they were filed with the claim filed on December 11, 2003.

3. The information for which confidential classification is requested reveals confidential and proprietary business information. Specifically, the information includes:

(a) Response to switching questions, (pp. 1-26) and (pp. 1-34) contains confidential customer information, such as the number of customers and number of lines per customer, as well as provisioning data, number of voice grade lines, location and switching numbers of ITC^DeltaCom switches, wire center and switch CLLI codes, and switch name and capacity;

(b) Response to transport questions (pp. 1,2) contains confidential transport information, ILEC CLLI codes, addresses, and coordinates, arrangement and transport type, number of transport circuits and supplier;

(c) Response to loop questions (pp. 1,2) contains confidential customer information, such as addresses, as well as the number of circuits for each customer and the loop owner and nature of the agreement with the owner.

5. The information contained in these Confidential Attachments provides detailed information about ITC^DeltaCom's switches, loops, transport, and most importantly, customers in the Florida market. The information contains specific proprietary information on the number, location and features of ITC^DeltaCom's switches and loops, and also provides detailed information about ITC^DeltaCom's ability to transport. These responses also provide insight into ITC^DeltaCom's customers and its market share of customers. ITC^DeltaCom considers such information to be trade secrets and proprietary, confidential business information which, if disclosed, would be of benefit to competitors and cause harm to ITC^DeltaCom and its customers. Such information provides ITC^DeltaCom an economic benefit, and is not known or readily ascertainable to other persons. Such

information is economically valuable to ITC^DeltaCom and its competitors, and ITC^DeltaCom treats such information as confidential and maintains many processes and procedures to maintain its secrecy.

6. A trade secret is defined in section 688.002(4), Florida Statutes, the Uniform Secrets Act, to mean:

[I]nformation, including a formula, pattern, compilation, program, device, method, technique, or process that:

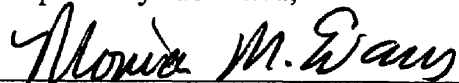
(a) Derives independent economic value, actual or potential, from not being generally known to, and not be readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and

(b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The information at issue fits plainly in this definition as set forth above. Accordingly, the Commission should grant the request for confidential treatment and find the information contained in its Confidential Responses Staff's 2003 TRO Data Request, in the areas of Loop, Switching, Transport and Remote Switches, to be confidential and exempt from section 119.071(1), pursuant to section 364.183(3)(a) and (e).

WHEREFORE, based on the foregoing, ITC^DeltaCom 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.

Respectfully submitted,



Floyd Self, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U.S. Mail on this 19th day of March, 2004.

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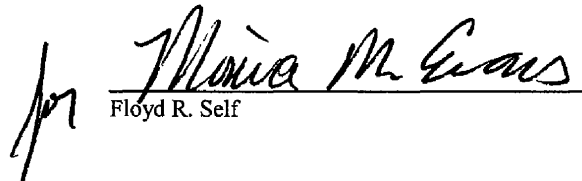
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