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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

March 24, 2004

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:

COMMISSION

On behalf of DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), enclosed for filing and distribution are the original and 15 copies of the following:

► DIECA Communications, Inc. d/b/a Covad Communications Company's Request for Specified Confidential Classification and Motion for Protective Order Regarding Confidential Hearing Exhibit Nos. 16 and 22.

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

RECEIVED & FILED

EPSC-BUREAU OF RECORDS

Sincerely,

Timothy J. Perry

TJP

AUS Enclosures

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This confidentiality request was filed by or for a "telco" for DNO3926-0 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.

#16 (500 1235703) #22 (500 11103-03 13575-03 01016-04)

DOCUMENT NUMBER - DATE

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

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FPSC-COMMISSION CLERK

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: March 24, 2004

<u>DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS</u> <u>COMPANY'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER REGARDING CONFIDENTIAL HEARING EXHIBIT NOS. 16 AND 22</u>

DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Specified Confidential Classification and Motion for Protective Order Regarding Confidential Hearing Exhibit Nos. 16 and 22.

- 1. On March 3, 2004, the Commission conducted its hearing in this docket. During the hearing, confidential portions of Covad's response to Staff's 2003 TRO Data Request and confidential responses to Staff, BellSouth and Verizon discovery were entered into the record as part of hearing Exhibit Nos. 16 and 22, respectively.
- 2. Exhibit No. 16 contains a confidential copy of Covad's Response to Staff's 2003 TRO Data Request. The document contains information regarding the number and location of Covad's switches, the areas where Covad provides service, the number of voice grade lines it has provisioned, the number of customers Covad serves and the type of service that Covad provides its customers. Covad considers this information to be confidential proprietary business information. Disclosure of this information could severely harm Covad's competitive interests

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in the marketplace. The information has not been made public. A more specific description of this information is contained in Attachment A.

- 3. Exhibit No. 22 contains a copy of Covad's Confidential Response to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (No. 6), Covad's Confidential Response to Staff's First Set of Interrogatories (Nos. 1(a), 1(b), 5(a), 5(c) and 7(c)), Covad's Confidential Response to BellSouth's Telecommunications, Inc.'s First Request for Production of Documents (No. 6) and Covad's Confidential Supplemental Response to Verizon's Request for Production of Documents (Nos. 2, 8 and 9).
- 4. Covad's Confidential Response to BellSouth's Telecommunications, Inc.'s First Set of Interrogatories (No. 6) contains information regarding the names of companies from which Covad has acquired transport, the CLLI codes of the starting and ending points of the transport routes and the capacity of transport. Covad considers this information to be confidential proprietary business information. Disclosure of this information could severely harm Covad's competitive interests in the marketplace. The information has not been made public. A more specific description of this information is contained in Attachment A.
- 5. Covad's response to Staff's Interrogatory Nos. 1(a) and 1(b) contains information regarding non-ILEC central office to central office transport facilities used by Covad as well as cost information for these facilities. Covad's response to Staff's Interrogatory No. 5(a) contains information regarding the locations of ILEC central offices where Covad is collocated. Response to Staff's Interrogatory No. 5(c) contains information regarding the date that Covad collocated at the facilities identified in its response to Interrogatory No. 5(a). Covad's response to Staff's Interrogatory No. 7(c) contains information regarding the equipment collocated at a Level 3 facility in Miami. Covad considers this information to be confidential proprietary

business information. Disclosure of this information could severely harm Covad's competitive interests in the marketplace. The information has not been made public. A more specific description of this information is contained in Attachment A.

- 6. Covad's Confidential Response to BellSouth's First Request for Production of Documents (No. 6) is a copy of Covad's confidential response to Staff's 2003 TRO Data Request. Covad considers this information to be confidential proprietary business information. Disclosure of this information could severely harm Covad's competitive interests in the marketplace. The information has not been made public. A more specific description of this information is contained in Attachment A.
- 7. Covad's Confidential Supplemental Response to Verizon's Request for Production No. 2 contains information regarding the location of Covad's operational collocation arrangements with ILECs. Supplemental Response to Verizon's Request for Production Nos. 8 and 9 contains information regarding the routes and capacity of dedicated transport obtained from non-ILECs in Florida. Covad considers this information to be confidential proprietary business information. Disclosure of this information could severely harm Covad's competitive interests in the marketplace. The information has not been made public. A more specific description of this information is contained in Attachment A.
- 8. Section 364.183, Florida Statutes, provides an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure of confidential business information would "impair the competitive business of the provider of the information."

 Disclosure of the Covad confidential information would harm its business operations by placing details of its operations and capabilities in the public domain. Accordingly, the information should be exempt from the public disclosure requirements of section 119.07, Florida Statutes.

- 9. Covad treats the information for which confidential classification is sought as private and confidential.
- 10. Appended hereto as Attachment B are two copies of each document with the confidential information reducted.
- 11. Appended hereto as Attachment C is a sealed envelope containing one copy of each document 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.

Charles Watkins

Senior Counsel

Covad Communications Co.

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for Vicki Gordon Kaufman

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Attorneys for DIECA Communications, Inc. d/b/a Covad Communications Company

ATTACHMENT A

DOCKET NO. 030852-TP

DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS COMPANY'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER REGARDING CONFIDENTIAL HEARING EXHIBIT NOS. 16 AND 22

EXPLANATION OF PROPRIETARY INFORMATION CONTAINED IN EXHIBIT NO. 16 AND 22

- 1. The document contains **CONFIDENTIAL** Covad information regarding the number and location of Covad's switches, the areas where Covad provides service, the number of voice grade lines it has provisioned, the number of customers Covad serves and the type of service that Covad provides its customers. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 2. The document contains **CONFIDENTIAL** Covad information regarding the number, type and location of Covad's remote switches. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 3. The document contains **CONFIDENTIAL** information regarding the names of companies from which Covad has acquired transport, the CLLI codes of the starting and ending points of the transport routes and the capacity of transport. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 4. The document contains **CONFIDENTIAL** information regarding non-ILEC central office to central office transport facilities used by Covad as well as cost information for these facilities. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when

disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.

- 5. The document contains **CONFIDENTIAL** information regarding the locations of ILEC central offices where Covad is collocated. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 6. The document contains **CONFIDENTIAL** information regarding the locations of ILEC central offices where Covad is collocated and the date Covad collocated there. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 7. The document contains **CONFIDENTIAL** information regarding the equipment collocated at a Level 3 facility located in Miami. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.
- 8. The document contains **CONFIDENTIAL** information regarding non-ILEC central office to central office transport facilities used by Covad. This information is related to Covad's ongoing business affairs and can be used by Covad's competitors to harm its competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24(a), Art. 1 of the State Constitution.

Chart provided in response to Staff's TRO Data Request titled "switching_covad_FL."

Page Number	Line(s)	Reason
1 of 7	3-68	1
2 of 7	69-135	1
3 of 7	136-202	1
4 of 7	203-269	1
5 of 7	270-336	1
6 of 7	337-403	1
7 of 7	404-421	1

Chart provided in response to Staff's TRO Data Request

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	titled "Remote Switch Addresses_cova	
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1 of 1	3 .	2
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1	1-3	3
	Covad's Confidential Response to S	taff's
	Interrogatory (Nos. 1(a) and 1(b))
Page Number	Line(s)	Reason
1	1-2	4
	Covad's Confidential Response to S	taff's
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Page Number	<u>Columns</u>	Reason
1	1-7	5
2	1-7	5
	Covad's Confidential Response to S	taff's
	Interrogatory (No. 5(c))	
Page Number	<u>Columns</u>	Reason
1	1-7	6
2	1-7	6 .
	Covad's Confidential Response to S	taff's
	Interrogatory (No. 7(c))	
Page Number	<u>Columns</u>	Reason
1	1-4	7
Covad's C	onfidential Response to BellSouth's Teleco	
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Page Number	<u>Line(s)</u>	Reason
COV000001	3	2
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COV000003	69-135	1
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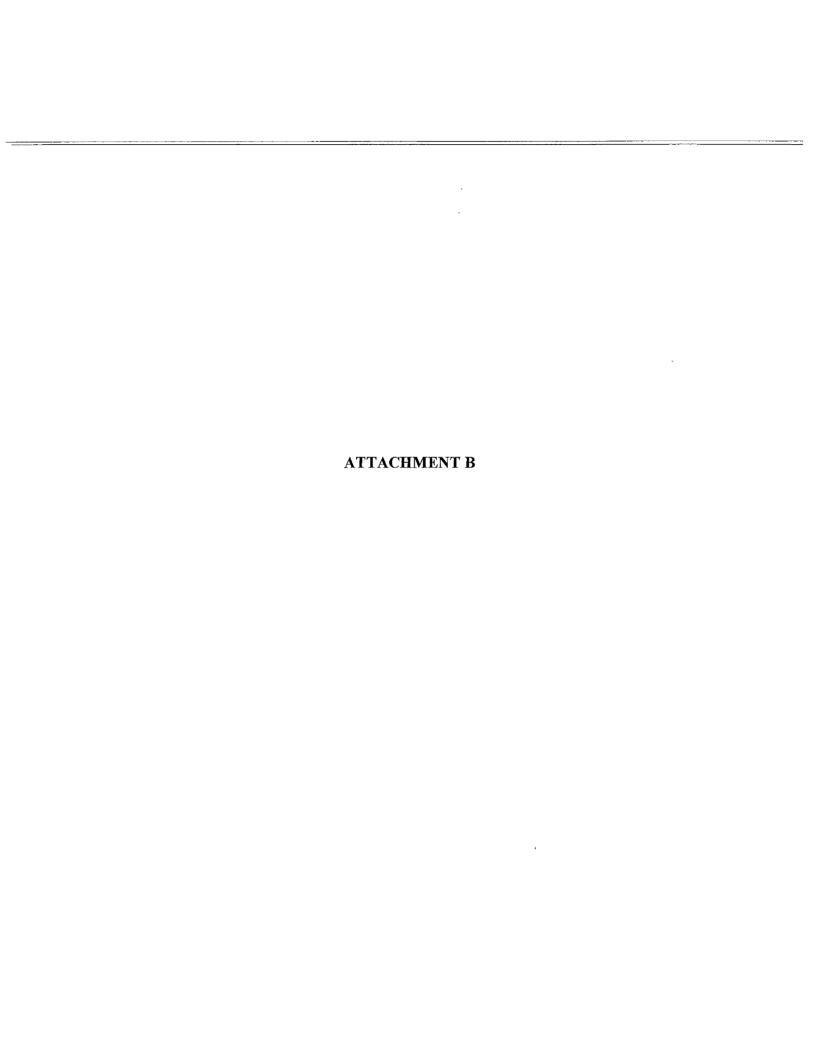
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Covad's Confidential Supplemental Response to Verizon's Request for Production (No. 2)

Page Number	Columns	Reason	
COV000009	1-7	5	
COV000010	1-7	5	

Covad's Confidential Supplemental Response to Verizon's Request for Production (Nos. 8 and 9)

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COV000011	1-2	8



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Worksheet for Response to Question 6:

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DOCKET NO. 030852-TP COVAD'S RESPONSE TO STAFF'S INTERROGATORY NOS. 1(a) AND 1(b)

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DOCKET NO. 030852-TP COVAD'S RESPONSE TO STAFF'S INTERROGATORY NO. 5(2)

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DOCKET NO. 030852-TP COVAD'S RESPONSE TO STAFF'S INTERROGATORY NO. 5(a)

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Carrier CLLI Region State Turnover Date

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DOCKET NO. 030852-TP COVAD'S RESPONSE TO STAFF'S INTERROGATORY NO. 5(c) CONFIDENTIAL

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DOCKET NO. 030852-TP COVAD'S RESPONSE TO STAFF'S INTERROGATORY NO. 7(ε)

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Remote Switch Addresses_covad_FL Remote Switch Addresses

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Docket No. 030852-TP Covad's Response to Bell's POD No. 6 switching_covad_FL Switching

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Docket No. 030852-TP Covad's Response to Bell's POD No. 6

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Covad's Response to Bell's POD No. 6

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Docket No. 030852-TP
Covad's Supplemental Response to
Verizon's POD No. 2

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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 Regarding Confidential Hearing Exhibit Nos. 16 and 22 has been provided by (*) hand delivery, (**) email and U.S. Mail this 24th day of March 2004 to the following:
- (*)(**) Adam Teitzman, Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850
- (**) Nancy White c/o Nancy Sims BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301-1556
- (**) Richard Chapkis Verizon Florida, Inc. 201 North Franklin Street MC: FLTC0717 Tampa, Florida 33602
- (**) Susan Masterton
 Sprint Communications Company
 1313 Blairstone Road
 Post Office Box 2214
 MC: FLTLHO0107
 Tallahassee, Florida 32301
- (**) Donna Canzano McNulty MCI WorldCom 1203 Governors Square Boulevard Suite 201 Tallahassee, Florida 32301
- (**) Norman H. Horton, Jr. 215 South Mornoe Street Tallahassee, Florida 32302-1876

- (**) Tracy Hatch AT&T Communications of the Southern States, LLC 101 North Monroe Street Suite 700 Tallahassee, Florida 32301
- (**) Michael Gross Florida Cable Telecommunications 246 East 6th Avenue Tallahassee, Florida 32302
- (**) Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Suite 2000 Orlando, Florida 32801
- (**) Jeffrey J. Binder Allegiance Telecom, Inc. 1919 M Street, NW Washington, DC 20037
- (**) Floyd R. Self Mésser, Caparello & Self 215 South Monroe Street, Suite 701 Tallahassee, FL 32301
- (**) Nanette Edwards ITC^DeltaCom 4092 S. Memorial Parkway Huntsville, Alabama 35802

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

Vicki Gordon Kaufman