## ORIGINAL

### Law Offices of Alan C. Gold, P.A.

1320 South Dixie Highway Suite 870 Coral Gables, FL 33146 (305) 667-0475 (305) 663-0799 - Fascimile RECEIVED FPSC

US MAR 21 AM 9: 52

COMMISSION CLERK

FPSC-COMMISSION CLERK

Alan C. Gold Direct Dial: 305-667-0475, ext. 1

e-mail: agold@kcl.net

James L. Parado Direct Dial: 305-667-0475, ext. 25 e-mail: jlp@kel.net

March 16, 2005

Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: 040732-TP

Enclosed please find the original and fifteen copies of STS Telecommunications, Inc.'s Request Specified Confidential Classification, which we ask that you file in the captioned docket.

Please mark it to indicate that the original was filed and return the copy to our office. Copies have been served to the parties shown on the attached Certificate of Service.

| 1        | Very truly                            | y yours,  |
|----------|---------------------------------------|---|
| MP       |                                       |   |
| OM       | Leanne Br                             | rown  |
| CTR      | For Alan                              |   |
| ECREnclo | osure                                 |   |
| eci L    | 7547.0                                | This confidentiality request was filed by or for a "telco" for DN <u>02273-05</u> No ruling |
| DPCcc:   | Mr. R. Douglas Lackey                 | is required unless the material is subject to a   |
| VMS      | Ms. Meredith Mays Ms. Nancy B. White  | request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.         |
| RCA      | Florida Public Service Commission     | ,   |
| SCR      | (rec'd 3/4/0                          | 5)  |
| SEC      | (rec'd 3/4/0<br>CCA note: DN 02273-05 |   |
| OTH      | PDF deleted from cm5.                 | DOCUMENT NUMBER-DATE  |
|          | The acula fame are.                   | 02708 MAR 21 8  |
|          |                                       | - 13 //W/ 51 9  |

ORIGINAL

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| In re: Interconnection Agreement between | )        |                       |
|--|----------|-----------------------|
| Saturn Telecommunication Services, Inc.  | )        | 04-0732-TP            |
| d/b/a STS Telecom and BellSouth          | <b>)</b> | Filed: March 17, 2005 |
| Telecommunications, Inc.                 | )        |                       |
|  | j        |                       |

# STS TELECOMMUNICATIONS, INC.'S REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION

SATURN TELECOMMUNICATION SERVICES, INC. d/b/a STS Telecom ("STS"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files its Request Specified Confidential Classification.

- On February 25, 2005, STS filed a Notice of Intent to Request Specified Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code.
- Upon review of all filings, STS has determined that the information it desires to keep confidential are all documents attached to the Affidavit of Jon Krutchik, which is an Exhibit to STS's Response In Opposition to BellSouth's Motion For Summary Final Order, filed on or about March 3, 2005.
- 3. The Attachments contain competitive business information. This information is valuable, it is used by STS in conducting its business and STS strives to keep it secret. Therefore, such information is a trade secret which 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.
- Public disclosure of the Attachments would provide STS's competitors with an advantage in that they would know STS's trade secrets. The data is valuable to competitors and potential competitors in formulating strategic

DOCUMENT NUMBER-DATE 02708 MAR 21 %

plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to STS. Disclosure of this data would impair the competitive business and cause harm to STS. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

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

ALAN C. GOLD, P.A.

Gables One Tower

1320 South Dixie Highway

Suite 870

Coral Gables, FL 33146

(305) 667-0475 (office)

(305) 663-0799 (telefax)

: ALAN C. GOLD, ESQUIRE

Florida Bar Number: 304875 JAMES L. PARADO, ESQUIRE

Florida Bar Number: 0580910

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been

served via regular US mail on this Aday of March 2005, to:

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

NANCY B. WHITE C/O Nancy H. Sims 150 South Monroe Street Suite 400 Tallahassee, FL 32301

R. DOUGLAS LACKEY
MERIDITH E. MAYS
Suite 4300, BellSouth Center
675 West Peachtree Street, N.E.
Atlanta, GA 30375
Lynn.Barclay@bellsouth.com

ALAN C. GOLD, ESQUIRE

Florida Bar Number: 304875 JAMES L. PARADO, ESQUIRE

Florida Bar Number: 0580910