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

Alan C. Gold

Direct Dial: 305-667-0475, ext. 1

e-mail: agold@kcl.net

1320 South Dixie Highway Suite 870 Coral Gables, Florida 33146 Telephone: (305) 667-0475, ext. 1 Facsimile: (305) 663-0799

James L. Parado Direct Dial: 305-667-0475, ext. 25

e-mail: jlp@kcl.net

April 22, 2005

Ms. Blanca Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 040732-TP

Dear Ms. Bayo:

١

Enclosed are an original and fifteen copies of Saturn Telecommunications, Inc.'s Request For Specified Confidential Classification for attachments to BellSouth's Motion For Summary Final Order, which we ask that you file in the captioned docket.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

CMP		Very truly yours,		
COM		and the		
CTR ECR		ALAN C. GOLD		
GCLEnclosure			001	
	ouglas Lackey		77. 23 100	
	edith Mays cy B. White		ku i	3
MI II	communications		in the confinence of the confi	
SCR		This confidentiality request was filed by or for a "telco" for DNO 1532-05 No ruling	çφ	15 15 15
SEC		is required unless the material is subject to a request per 119.07, FS, or is admitted in the	46	20
OTH I COME,		record per Rule 25-22.006(8)(b), FAC.		

records

EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

04000 APR 25 g

FPSC-COMMISSION CLERK



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)	
Telecommunications, Inc.)	
)	

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.

- 1. 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 contained on the compact disc which were submitted as BellSouth's Exhibits to the Affidavit of Cynthia A. Clark, which is was attached to BellSouth's Motion For Summary Final Order, filed on or about February 14, 2005.
- 3. The information contained on the compact disc which were submitted as BellSouth's Exhibits to the Affidavit of Cynthia A. Clark contain customers' private and confidential information.
- 4. The information contained on the compact disc which were submitted as BellSouth's Exhibits to the Affidavit of Cynthia A. Clark 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

DOCUMENT NUMBER-DATE

04000 APR 25 8

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 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.
- 6. 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.
- 7. 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 day of April 2005, to:

Blanca Bayo, Division of the Commission Clerk and Administrative Services 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