



July 15, 2005

VIA FEDERAL EXPRESS

Beth Salak Florida Public Service Commission Director of the Division of Competitive Markets & Enforcement Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Request for Confidentiality; Responses to Year 2005 Local Competition Re: Report Data Request

Dear Ms. Salak:

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OPC \_\_\_\_

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SEC

In response to the Year 2005 Local Competition Report Data Request (the "Data Request") propounded by the Florida Public Service Commission (the "Commission"), and pursuant to Commission Rule 25-22.006, Florida Administrative Code, TelCove Investment, LLC and TelCove of Jacksonville, Inc. (collectively, "TelCove") hereby simultaneously submit their responses (in both soft- and hard-copy form) to the Data Request and request confidential treatment of the information provided by TelCove in response to questions 5(f), 6(c), 6(e), 8(a), 9, and 11, as well as the "Exchange," and "Total VGE Lines" columns in CLEC Table 1; the "Exchange," and "Total Lines" columns in CLEC Table 2; the "Packet/Circuit" and "# of Switches" columns in CLEC Table 3; the TelCove Internet Port Pricing Chart, and Parts I, II, and V of FCC Form 477 (collectively, the "Confidential Information").

With respect to the Confidential Information, in each case, it constitutes "proprietary confidential business information" as that term is defined in FS 364.183(3). Specifically the Confidential Information contains information revealing the status of VOIP productdevelopment (Question 5(f)); broadband Internet line counts and pricing (Questions 6(c) and 6(e)); TelCove's anticipated merger plans (Question 8(a)); network investment (Question 9); line counts and exchange names where TelCove provides service (CLEC Tables 1 and 2); the type and number of switches being utilized (CLEC Table 3); and the means of provisioning and location of service provision (FCC Form 477). The information supplied by TelCove in response to each of those inquiries constitutes both trade secrets of TelCove oth low by TelCove in response to each of those inquiries constitutes both trade secrets of TelCove and information relating to TelCove's competitive interests, the disclosure of which would impair TelCove's competitive business. (See FS 364.183(3)(e).) (With respect to FCC Form 477, the redacted information has already been accorded confidential treatment pursuant to the FCC's rules.) Accordingly, it would be appropriate for the Commission to

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grant the confidential status requested by TelCove. In compliance with Commission Rule 25-22.006, Florida Administrative Code, TelCove has attached one (1) highlighted, unredacted copy of its responses to the Data Requests and two (2) redacted copies of the same. Upon receipt of these documents for filing, please return a file-stamped copy of these filings to us in the enclosed, self-addressed envelope.

Thank you, and if you have any questions or concerns, please call me.

Sincerely,

Edward T. Depp

Manager of Legal and Regulatory Affairs

ETD/bc Enclosures