

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Establish Generic Docket
To Consider Amendments to Interconnection
Agreements Resulting from Changes of
Law.

Docket No. 041269-TP

Filed: November 2, 2005

COMMISSION
CLERK

05 NOV - 2 PM 2: 27

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COMPSOUTH'S FIRST
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

The Competitive Carriers of the South, Inc. (CompSouth) pursuant to Rule 25-22.006, Florida Administrative Code, file this Request for Specified Confidential Classification.

1. On October 12, 2005, CompSouth filed its Supplemental Response to Staff's Interrogatory No. 27. Simultaneously, CompSouth filed its Notice of Intent to Request Confidential Classification pursuant to Rule 25.22.006(3)(a), Florida Administrative Code.

2. One of the documents attached to the response, Attachment C, contains information that is confidential proprietary business information as described in section 364.183, Florida Statutes.

3. Attachment C to CompSouth's Supplemental Response to Staff Interrogatory 27 contains confidential proprietary information belonging to multiple carriers. This information is closely held and not known to competitors or to the general public. Attachment C contains information on the number, type and location of lines and circuits currently in dispute between

CMP 1 BellSouth and CompSouth. CompSouth and competitors consider this information to be
COM _____ confidential proprietary business information. Its disclosure would be competitively detrimental.
CTR _____

ECR _____ 5. Section 364.183, Florida Statutes, provides an exemption from the disclosure
GCL 1 requirements of section 119.07, Florida Statutes, when disclosure of confidential business
OPC _____ information would "impair the competitive business of the provider of the information."

RCA _____ Disclosure of the confidential information in Attachment C would harm competitor's
SCR _____

SGA _____

SEC 1

OTH 1 conf
records

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FPSC-BUREAU OF RECORDS

Motion/RCC Confidential
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE

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competitive interests by placing details of competitive business operations in the public domain and providing information about business line and circuit location. Accordingly, the information should be exempt from the public disclosure requirements of section 119.07, Florida Statutes. Further, this information is considered and is treated as confidential and proprietary. A more specific description of the exhibit information is contained in Attachment A to this request.

6. Appended hereto as Attachment B are two copies of the requested documents with the confidential classification redacted.

7. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents that CompSouth claims are confidential and proprietary.

WHEREFORE, based on the foregoing, CompSouth 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.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Specified Confidential Classification was served on the following by electronic mail or U.S. Mail this 2nd day of November 2005:

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ATTACHMENT A

DOCKET NO. 041269-TP

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Explanation of Proprietary Information

1. The copies contain **CONFIDENTIAL** information regarding the location, number and type of specific lines and circuits utilized by multiple carriers. This information is related to competitor's ongoing business affairs and operations and can be used by competitors to harm 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.

Attachment C to CompSouth's Supplemental Response to Staff's Interrogatory No.27

<u>Page Nos.</u>	<u>Line(s)</u>	<u>Reason</u>
All	All	1

ATTACHMENT B

DOCKET NO. 041269-TP

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION
REDACTED VERSION OF ATTACHMENT C**

**ENTIRE DOCUMENT IS CONFIDENTIAL THEREFORE NO REDACTED VERSION
IS SUBMITTED.**

ATTACHMENT B

DOCKET NO. 041269-TP

**COMPETITIVE CARRIERS OF THE SOUTH, INC.'S
FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION
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