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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 7, 2005

COMMISSION  
CLERK

NETWORK TELEPHONE CORPORATION'S FIRST  
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

Network Telephone Corporation (NTC), pursuant to Rule 25-22.006, Florida Administrative Code, files this First Request for Specified Confidential Classification.

1. On October 17, 2005 NTC responded to BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories to Network Telephone (Nos. 1- 3). NTC's responses included a spreadsheet attachment. On October 25, 2005 NTC supplemented the response with an additional spreadsheet. The attachments contain confidential proprietary information concerning circuit information, line locations, and transport providers.

2. Because the original and supplemental discovery responses contain information that is confidential and proprietary, NTC simultaneously filed a Notice of Intent to Request Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, with each response in order to allow the Commission to take possession of the responses without delay.

3. 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 information on the attached spreadsheets would harm NTC's competitive interests by placing details of its business operations, specifically circuit information, line locations and transport providers, in the public domain. Accordingly, the information should be

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exempt from the public disclosure requirements of section 119.07, Florida Statutes. Further, NTC considers and treats this information as confidential and proprietary. A more specific description of the exhibit information is contained in Attachment A.

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

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the original and supplemental spreadsheet documents that NTC claims are confidential and proprietary.

**WHEREFORE**, based on the foregoing, NTC 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.

s/ Vicki Gordon Kaufman  
Vicki Gordon Kaufman  
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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 and U.S. Mail this 7th day of November 2005:

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**ATTACHMENT A**  
**DOCKET NO. 041269-TP**

**NTC'S**  
**FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

**Explanation of Proprietary Information**

1. The copies contain **CONFIDENTIAL** information regarding the location of NTC's lines and circuits and transport providers. This information is related to NTC'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 to NTC's Response to BellSouth's Interrogatory No. 2**

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

**Attachment to NTC's Supplemental Response to BellSouth's Interrogatory No. 2**

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

**ATTACHMENT**

**B**

**DOCKET NO. 041269-TP**

**NTC.'S**

**FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION  
ATTACHMENT TO NTC'S RESPONSE TO BELLSOUTH'S INTERROGATORY NO.2  
AND SUPPLEMENTAL RESPONSE TO BELLSOUTH'S INTERROGATORY NO. 2  
BOTH DOCUMENTS HAVE BEEN COMPLETELY REDACTED**

**ATTACHMENT**

**B**

**DOCKET NO. 041269-TP**

**NTC.'S**

**FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION  
ATTACHMENT TO NTC'S RESPONSE TO BELLSOUTH'S INTERROGATORY NO.2  
AND SUPPLEMENTAL RESPONSE TO BELLSOUTH'S INTERROGATORY NO. 2  
BOTH DOCUMENTS HAVE BEEN COMPLETELY REDACTED**