



Tracy Hatch  
Senior Attorney  
Law and Government Affairs  
Southern Region

Suite 700  
101 N. Monroe Street  
Tallahassee, FL 32301  
850-425-6360

February 17, 2006

Ms. Blanca Bayó, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Dockets Nos. 050119-TP and 050125-TP

**CONFIDENTIAL INFORMATION ENCLOSED**

Dear Ms. Bayó:

Enclosed for filing in the above referenced dockets is a copy of AT&T's Responses to Staff's First Set of Interrogatories to AT&T Communications of the Southern States, LLC. Attached to the interrogatory responses is a Confidential Attachment A. Attachment A contains information in response to Interrogatories Nos. 7(e) and 7(g). Pursuant to Section 364.183(1), Florida Statutes, AT&T hereby claims that the entire contents of the Confidential Attachment A are confidential and proprietary business information that should be held exempt from public disclosure. Pursuant to Rule 25-22.006(5), Florida Administrative Code, in the attached envelope is one copy of AT&T's Confidential Attachment A with the confidential information highlighted.

If you have any questions, please do not hesitate to contact me at (850) 425-6360.

Thank you for your assistance with this filing.

Sincerely yours,

Tracy W. Hatch

TWH/sd  
Enclosure  
cc: Parties of Record

DOCUMENT NUMBER-DATE

03544 APR 20 06

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**DOCKET NOS. 050119 and 050125-TP**

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S. Mail this 20th day of April 2006, the following parties of record:

Felicia R. Banks  
Senior Attorney  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

Laura King  
Division of Competitive Markets & Enforcement  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

ALLTEL  
Stephen B. Rowell/Bettye Willis  
One Allied Drive, B5F11  
Little Rock, AR 72202

ALLTEL Florida, Inc.  
Mr. James White  
6867 Southpoint Drive, N., Suite 103  
Jacksonville, FL 32216-8005

Sprint  
Susan S. Masterton  
1313 Blair Stone Rd.  
Tallahassee, FL 32301

BellSouth Telecommunications, Inc.  
Nancy B. White/R. D. Lackey/M. Mays  
c/o Nancy H. Sims  
150 South Monroe Street, Suite 400  
Tallahassee, FL 32301-1556

Competitive Carriers of the South, Inc.  
Vicki Gordon Kaufman  
c/o Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301

Paul Vickery  
Division of Competitive Markets & Enforcement  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

Kira Scott  
Senior Attorney  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

Vicki Gordon Kaufman  
Moyle Flanigan Katz Raymond & Sheehan  
For MetroPCS California/Florida  
118 N. Gadsden Street  
Tallahassee, FL 32301

Neutral Tandem-Florida, LLC  
Ronald W. Gavillet  
One South Wacker, Suite 200  
Chicago, IL 60606

Ausley Law Firm  
J. Jeffrey Wahlen  
P.O. Box 391  
Tallahassee, FL 32302

Blooston Law Firm  
Benjamin H. Dickens, Esq.  
2120 L Street, NW  
Suite 300  
Washington, DC 20037

Friend Law Firm  
Charles V. Gerkin, Jr.  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346

Frontier Communications of the South, Inc.  
Ms. Angie McCall  
300 Bland Street  
Bluefield, WV 24701-3020

GT Com  
Mr. Mark Beightol  
P. O. Box 220  
Port St. Joe, FL 32457-0220

ITS Telecommunications Systems, Inc.  
Mr. Robert M. Post, Jr.  
P. O. Box 277  
Indiantown, FL 34956-0277

MetroPCS California/Florida, Inc.  
8144 Walnut Hill Lane, Suite 800  
Dallas, TX 75231

NEFCOM  
Ms. Deborah Nobles  
505 Plaza Circle, Suite 200  
Orange Park, FL 32073-9409

NuVox Communications, Inc.  
Susan J. Berlin  
Two North Main Street  
Greenville, SC 29601

Rutledge Law Firm  
Ken Hoffman/Martin McDonnell/M. Rule  
P.O. Box 551  
Tallahassee, FL 32302-0551

Smart City Telecom  
P. O. Box 22555  
Lake Buena Vista, FL 32830-2555

Sprint Nextel (GA)  
William R. Atkinson  
Mailstop GAATLD0602  
3065 Cumberland Circle SE  
Atlanta, GA 30339

TDS Telecom/Quincy Telephone  
Mr. Thomas M. McCabe  
P. O. Box 189  
Quincy, FL 32353-0189

Law Offices of Patrick K. Wiggins, P.A.  
Patrick Wiggins  
Post Office Drawer 1657  
Tallahassee, FL 32302

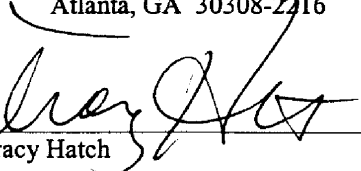
Messer law Firm  
Floyd R. Self  
P.O. Box 1876  
Tallahassee, FL 32302-1876

T-Mobile USA, Inc.  
Michele K. Thomas  
60 Wells Avenue  
Newton, MA 02459

TDS Telecom/Quincy Telephone  
Mr. Thomas M. CcCabe  
P.O. Box 189  
Quincy, FL 32353-0189

Troutman Law Firm  
Charles F. Palmer  
600 Peachtree Street, N.E.  
Suite 5200  
Atlanta, GA 30308-2216

Verizon Wireless (DC)  
Elaine D. Critides  
1300 I Street, N.W.  
Suite 400 West  
Washington, DC 20005

  
Tracy Hatch

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Joint petition by TDS Telecom d/b/a TDS Telecom/Quincy Telephone; ALLTEL Florida, Inc.; Northeast Florida Telephone Company d/b/a NEFCOM; GTC, Inc. d/b/a GT Com; Smart City Telecommunications, LLC d/b/a Smart City Telecom; ITS Telecommunications Systems, Inc.; and Frontier Communications of the South, LLC ["Joint Petitioners"] objecting to and requesting suspension and cancellation of proposed transit traffic service tariff filed by BellSouth Telecommunications, Inc. DOCKET NO. 050119-TP

In re: Petition and complaint for suspension and cancellation of Transit Traffic Service Tariff No. FL2004-284 filed by BellSouth Telecommunications, Inc., by AT&T Communications of the Southern States, LLC. DOCKET NO. 050125-TP  
February 20, 2006

AT&T OF THE SOUTHERN STATES, LLC'S REQUEST  
FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

AT&T Communication of the Southern States, LLC ("AT&T"), pursuant to Section 364.183, Florida Statutes and Rule 25-22.006(8), Florida Administrative Code, files this Request for Confidential Classification and states as follows:

1. On February 17, 2006, AT&T filed its responses to the Commission Staffs First Set of Interrogatories. AT&T's responses to interrogatories 7(e) and 7(g) contains confidential proprietary business information belonging to AT&T. In conjunction with

the confidential responses to interrogatories 7(e) and 7(g), AT&T also filed its claim of confidentiality pursuant to Rule 15-22-006(5), Florida Administrative Code.

2 AT&T's confidential responses to Staff's interrogatories 7(e) and 7(g) were included in Stipulated Exhibit 4 and admitted to the record at the hearing held March 29 and 30, 2006 in the above referenced dockets.

3. Section 364.183 provides that information which meets certain criteria is exempt from public disclosure under Section 119.07, Florida Statutes.

4. Section 364.183 provides that confidential proprietary business information is any information that is owned or controlled by a company, is intended to be and is treated by the company as private in that the disclosure of the information would cause harm to the ratepayers or the company's business operations and has not be previously disclosed. Confidential information includes but is not limited to:

- a) trade secrets
- b) internal auditing controls and reports of internal auditors
- c) security measures, systems, or procedures
- d) information concerning bids or other contractual data
- e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information
- f) employee personnel information unrelated to compensation, the disclosure of which would impair the competitive business of the provider of information .

5. The information provided to the Staff in response to interrogatories 7(e) and 7(g) relates to the competitive interests of AT&T and the public disclosure of such information would impair the competitive business and harm the business operations of AT&T. The information provided in the confidential responses to the Staff's interrogatories provides a virtual roadmap to the extent and capacity of AT&T's

interconnection with other carriers. This information, if disclosed would provide competitors with valuable network information belonging to AT&T giving such competitors an artificial advantage in where and how to compete with AT&T. Such disclosure would clear harm AT&T's competitive business interests as well as harm the business operations of AT&T.

6.. The information for which confidential classification is sought is intended to be and is treated by AT&T as private and confidential and has not been otherwise publicly disclosed.

7. Accordingly, the information should be determined to be proprietary confidential business information pursuant to Section 364.183, exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

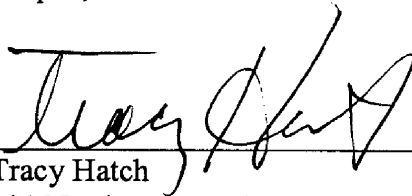
8. Since the information for which confidential classification constitutes virtually the entire document, no line by line explanation is being provided.

9. Attached as Attachment A are two copies of the redacted version of AT&T's confidential responses to Staff's interrogatories 7(e) and 7(g).

10. Attachment B contains one copy of the confidential responses to interrogatories 7(e) and 7(g) with the confidential information highlighted.

WHEREFORE, based on the foregoing AT&T respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission grant AT&T's request that the identified information in AT&T's responses to Staff's Interrogatories 7(e) and 7(g) be deemed proprietary confidential business information and be held exempt from public disclosure.

Respectfully submitted this 20<sup>th</sup> day of April, 2006.



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Tracy Hatch  
101 North Monroe Street  
Suite 700  
Tallahassee, FL 32301  
(850) 425-6360 (Telephone)  
(850) 425-6361 (Facsimile)

Attorney for AT&T Communications of the  
Southern States, LLC

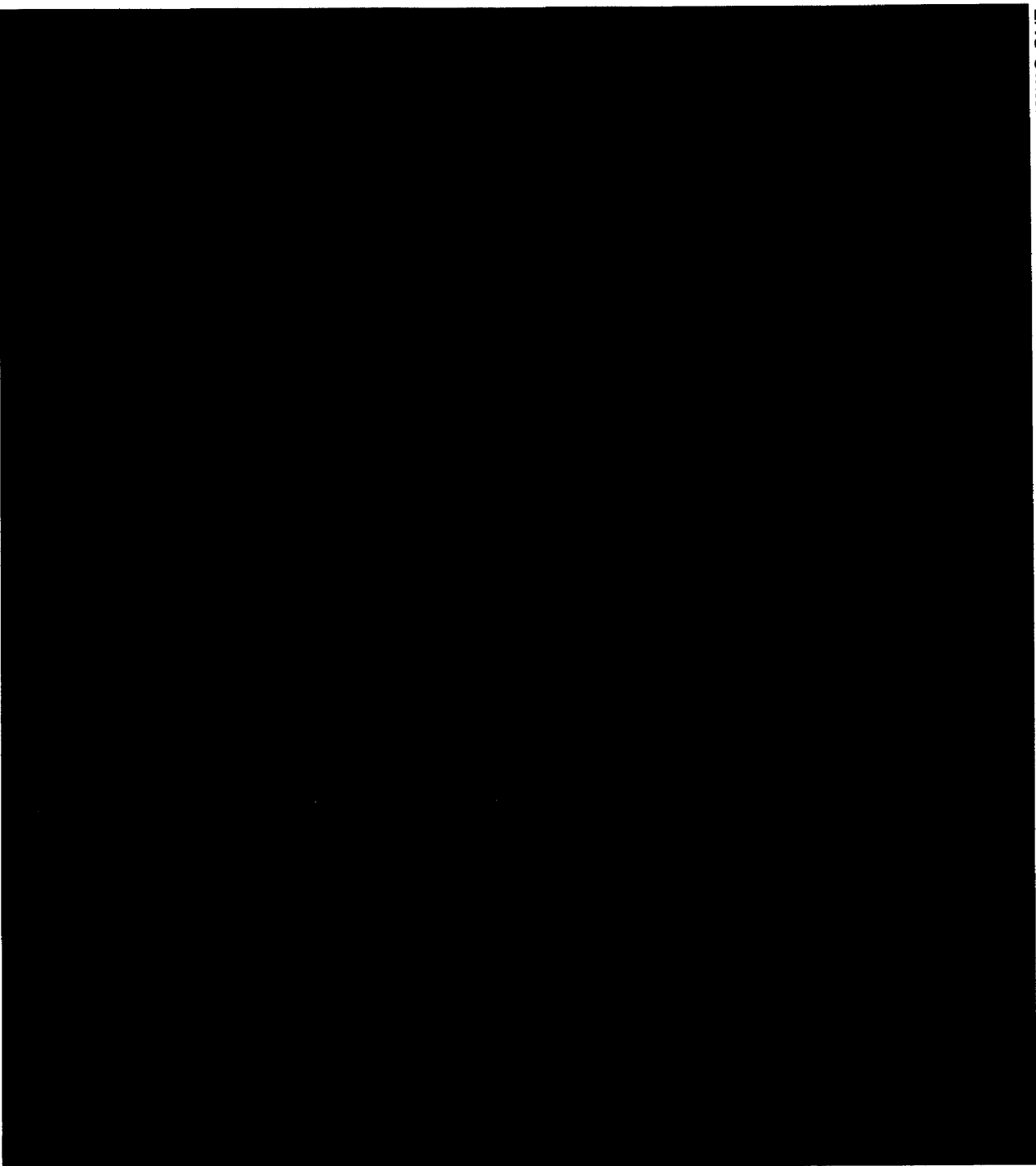
**ATTACHMENT A**



CONFIDENTIAL ATTACHMENT

Response to Interrogatory 7(e) and 7(g)

LNS Switch      Far End CLLI      Carrier      TGN      TSC      TIS      BH



CONFIDENTIAL ATTACHMENT

Response to Interrogatory 7(e) and 7(g)

LNS Switch

Far End CLLI

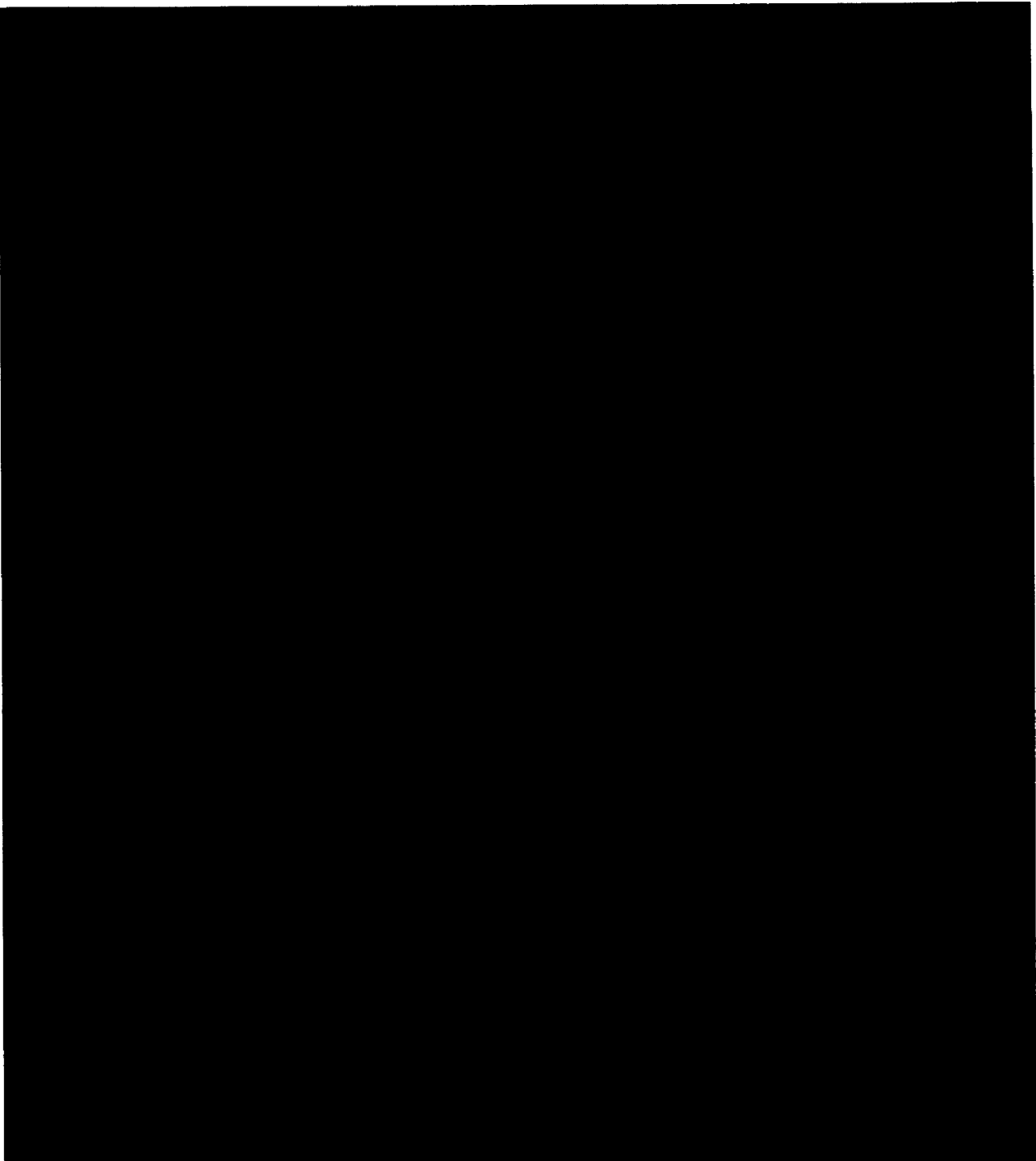
Carrier

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CONFIDENTIAL ATTACHMENT

Response to Interrogatory 7(e) and 7(g)

LNS Switch

Far End CLLI

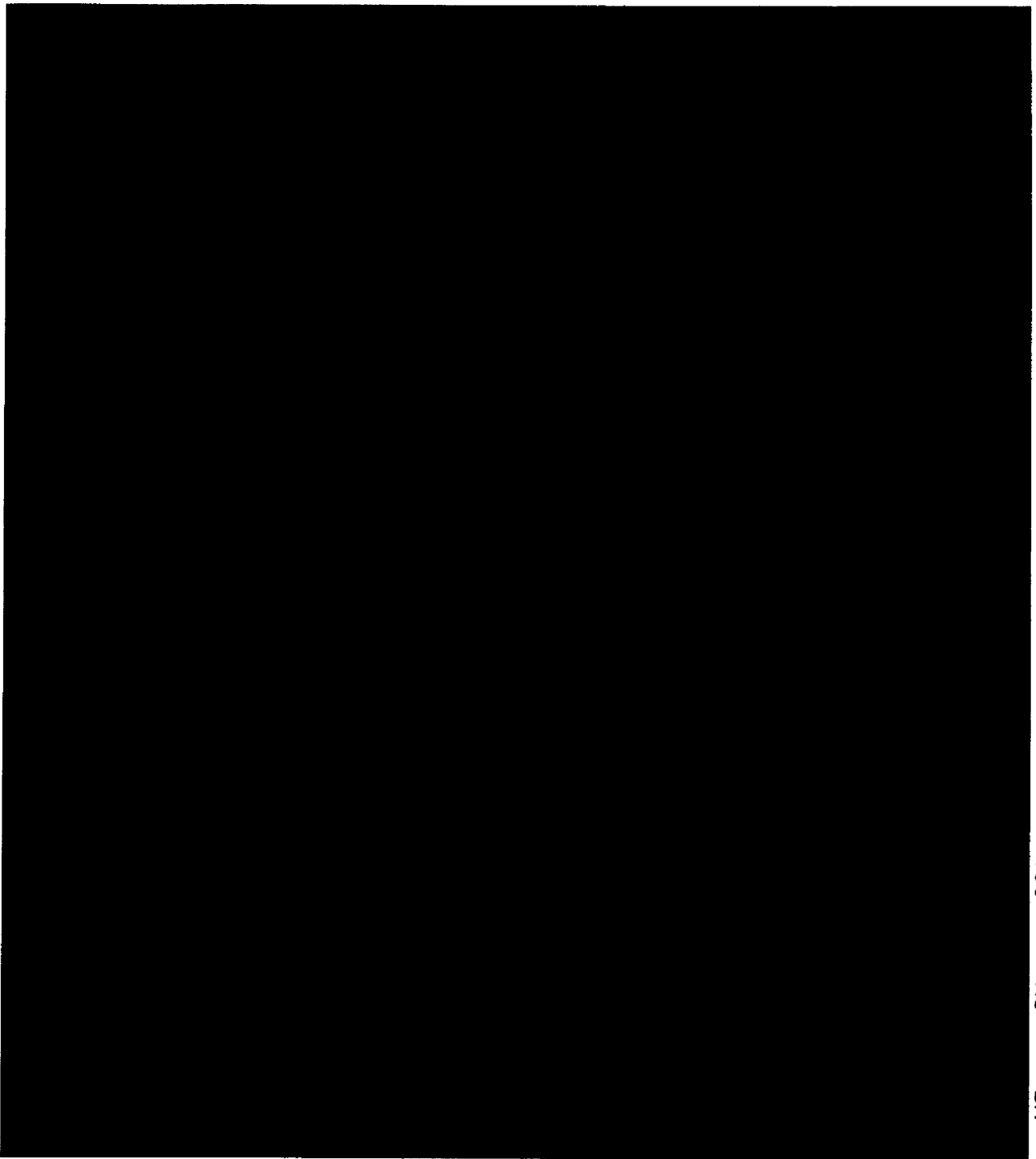
Carrier

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LNS Switch

Far End CLLI

Carrier

TGN

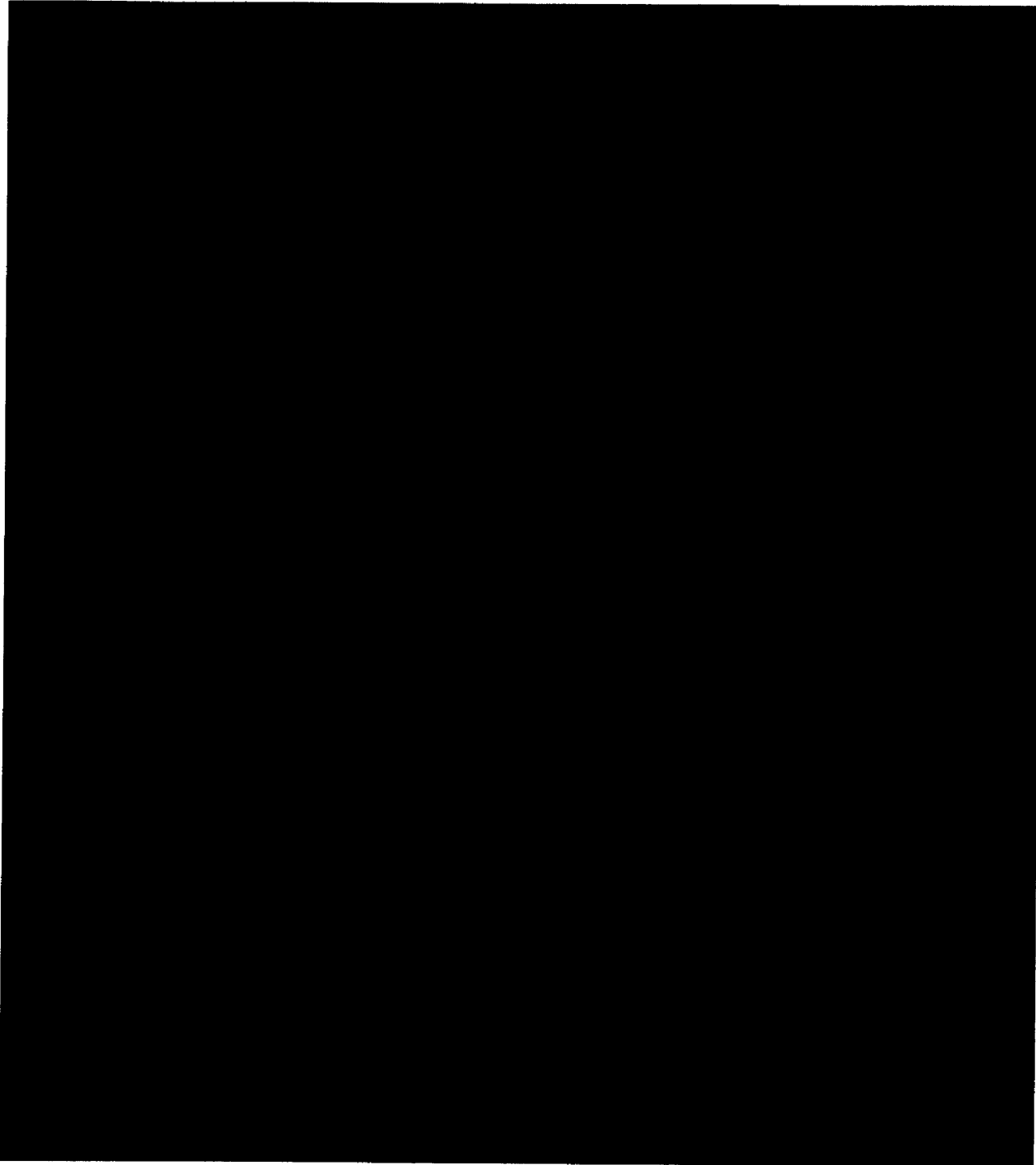
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**CONFIDENTIAL ATTACHMENT**

**Response to Interrogatory 7(e) and 7(g)**



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LNS Switch

Far End CLLI

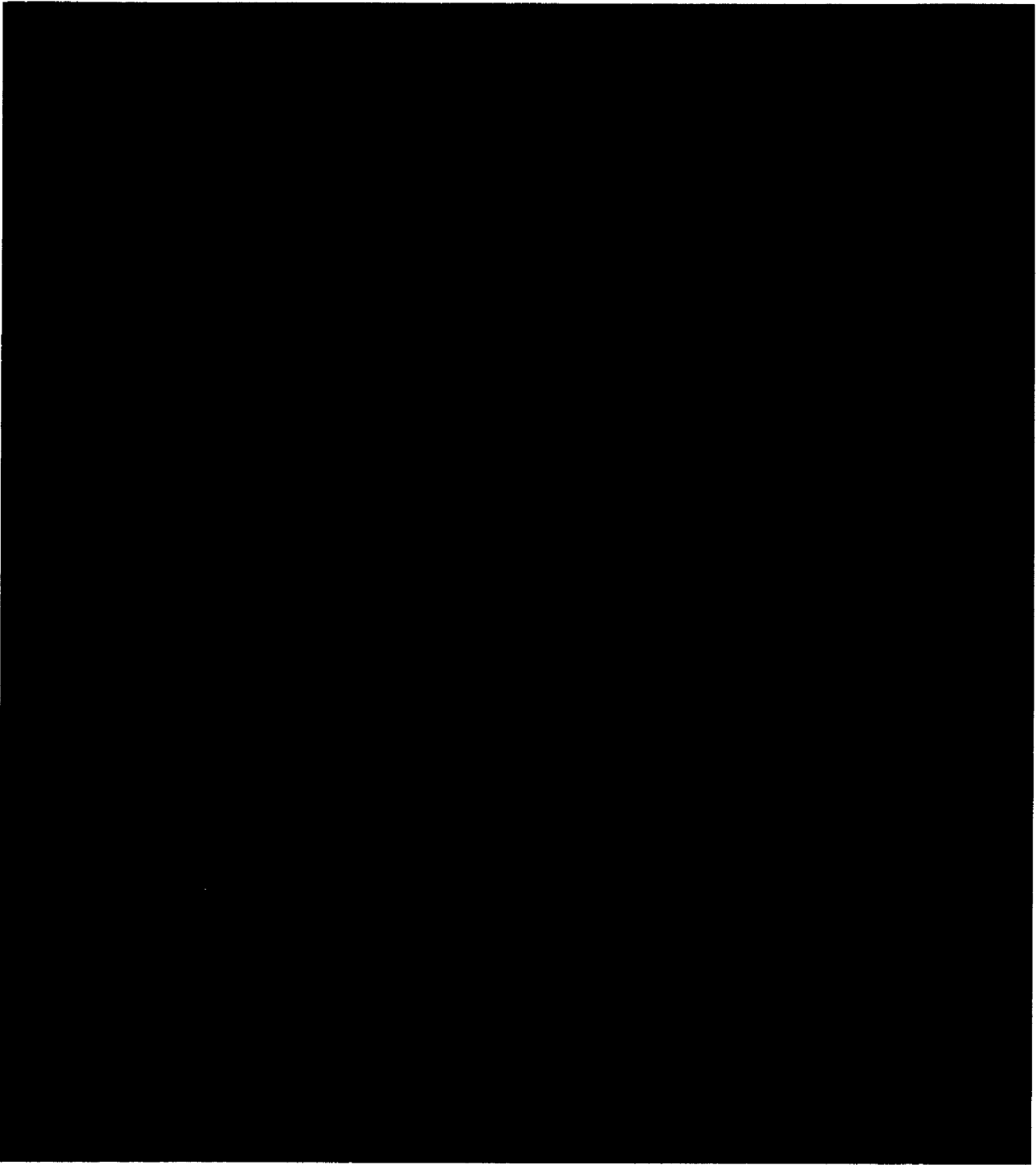
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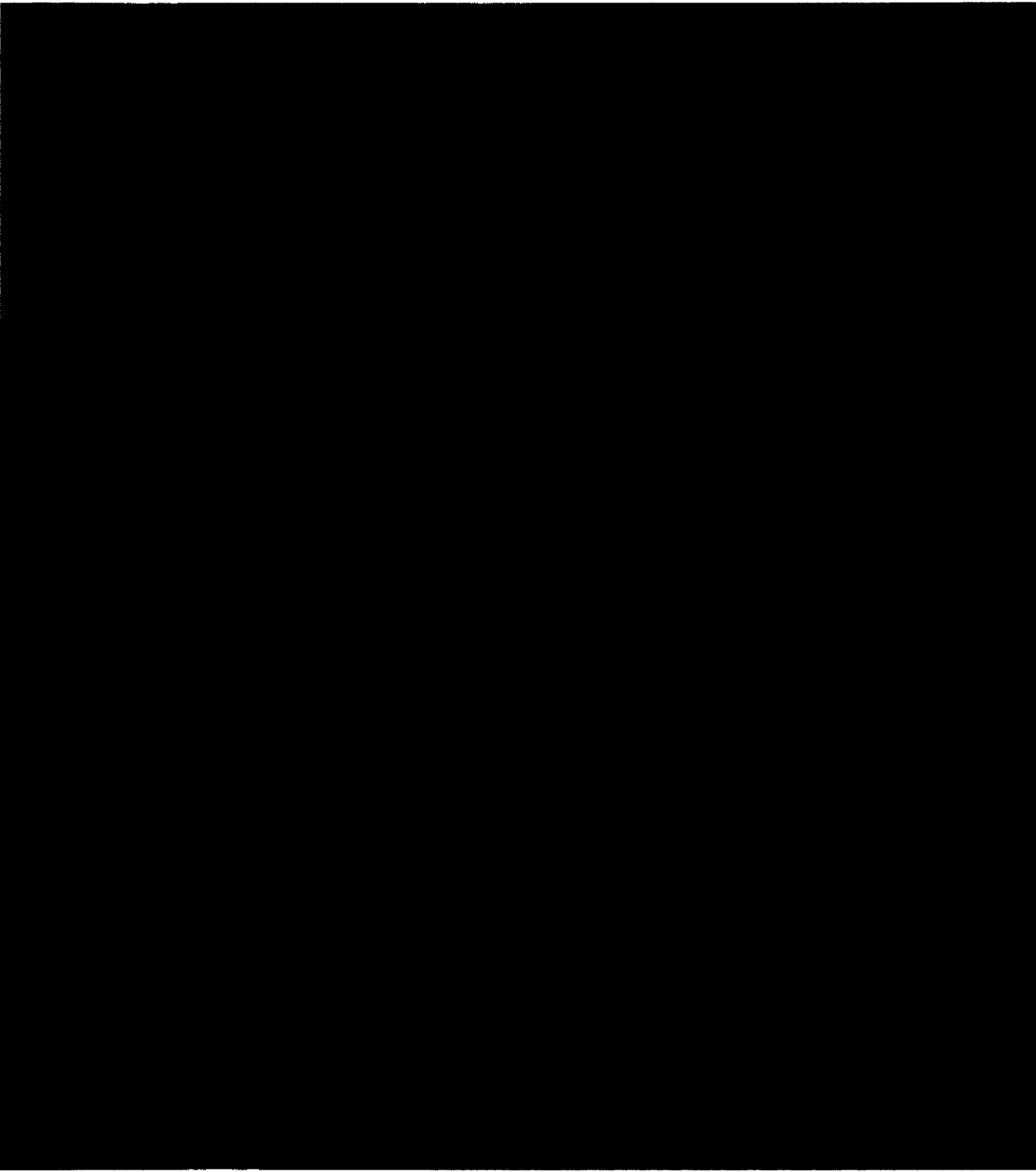
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LNS Switch      Far End CLLI      Carrier      TGN      TSC      TIS      BH



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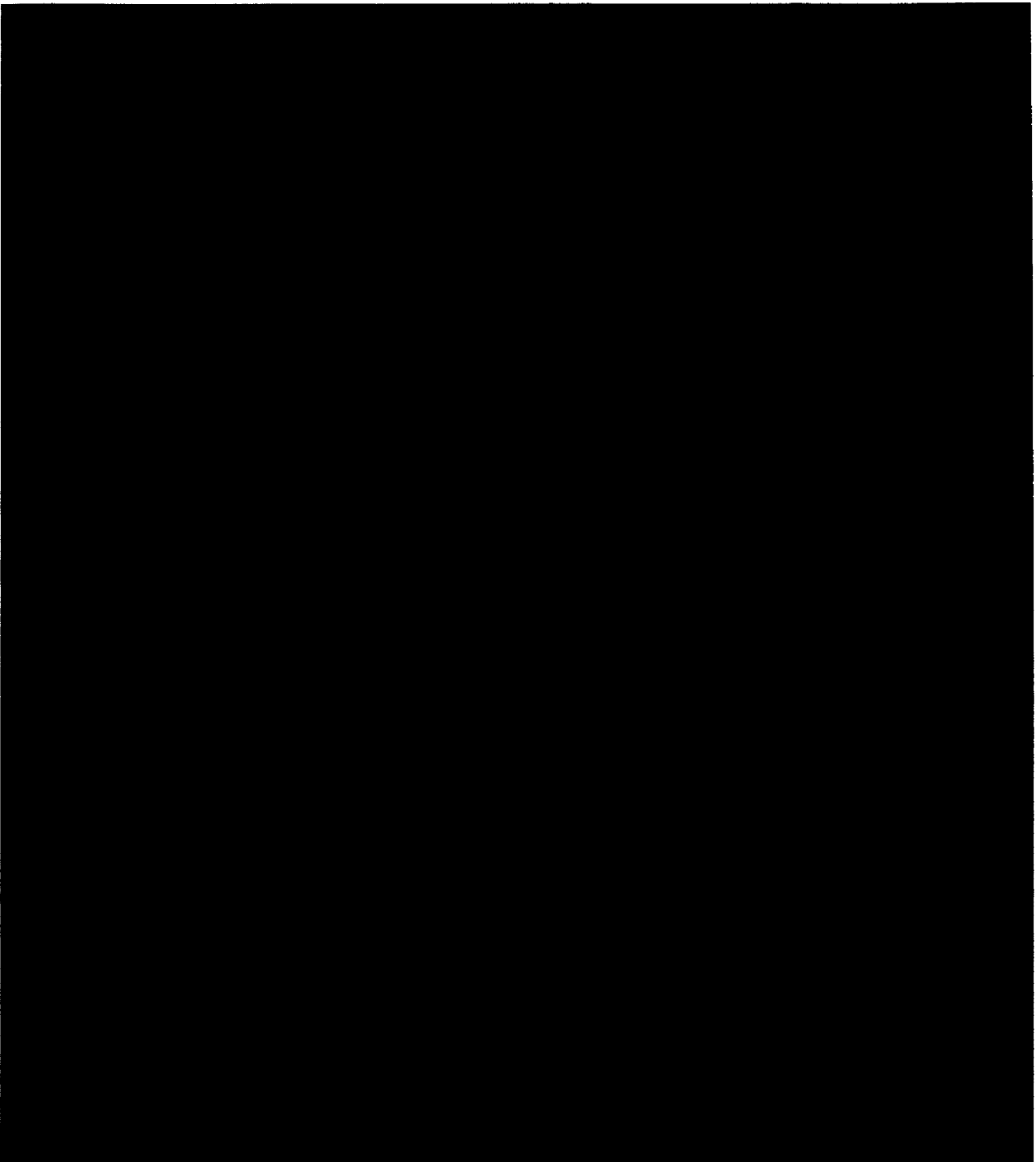
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Response to Interrogatory 7(e) and 7(g)

LNS Switch

Far End CLI

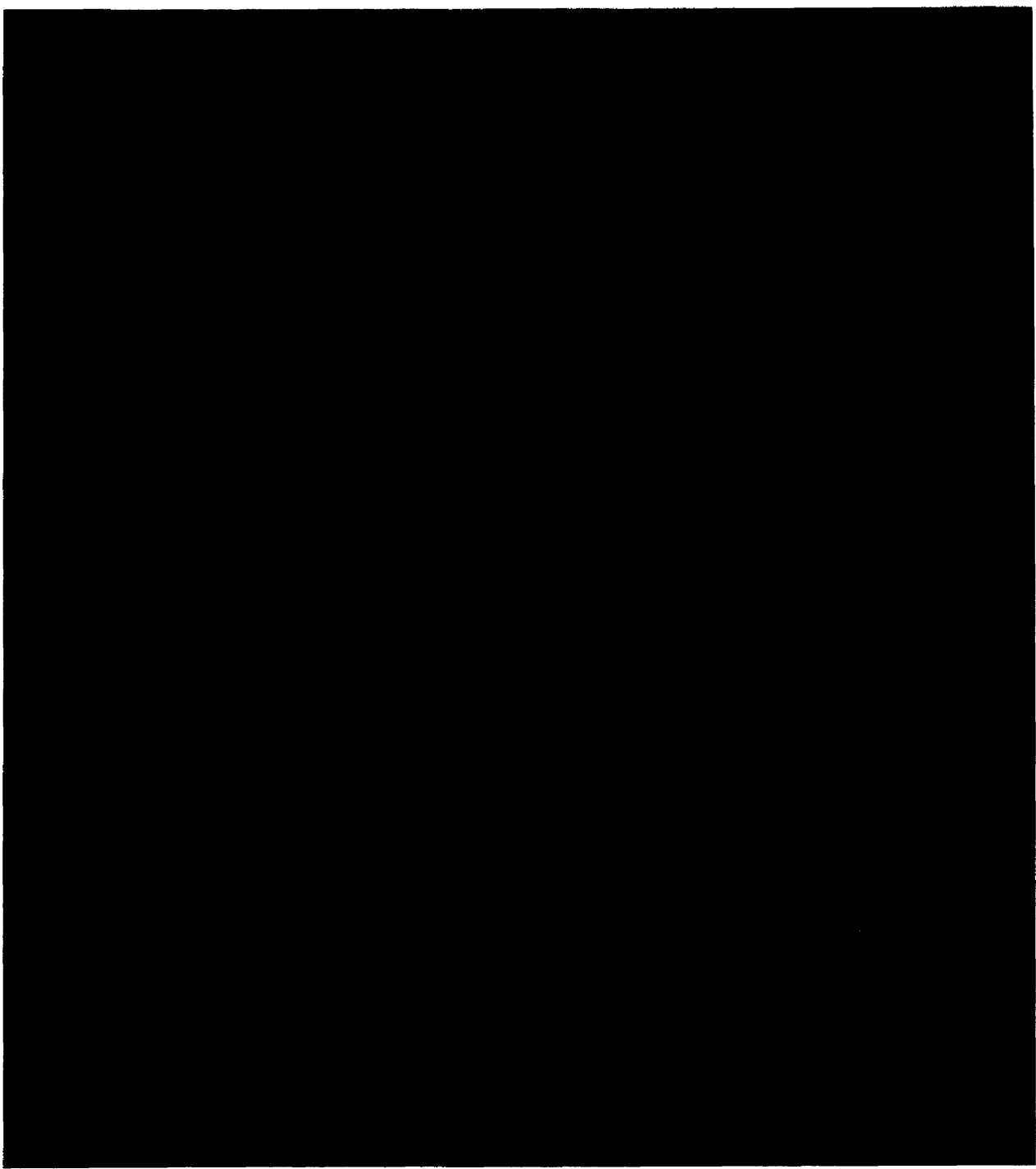
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LNS Switch

Far End CLLI

Carrier

TGN

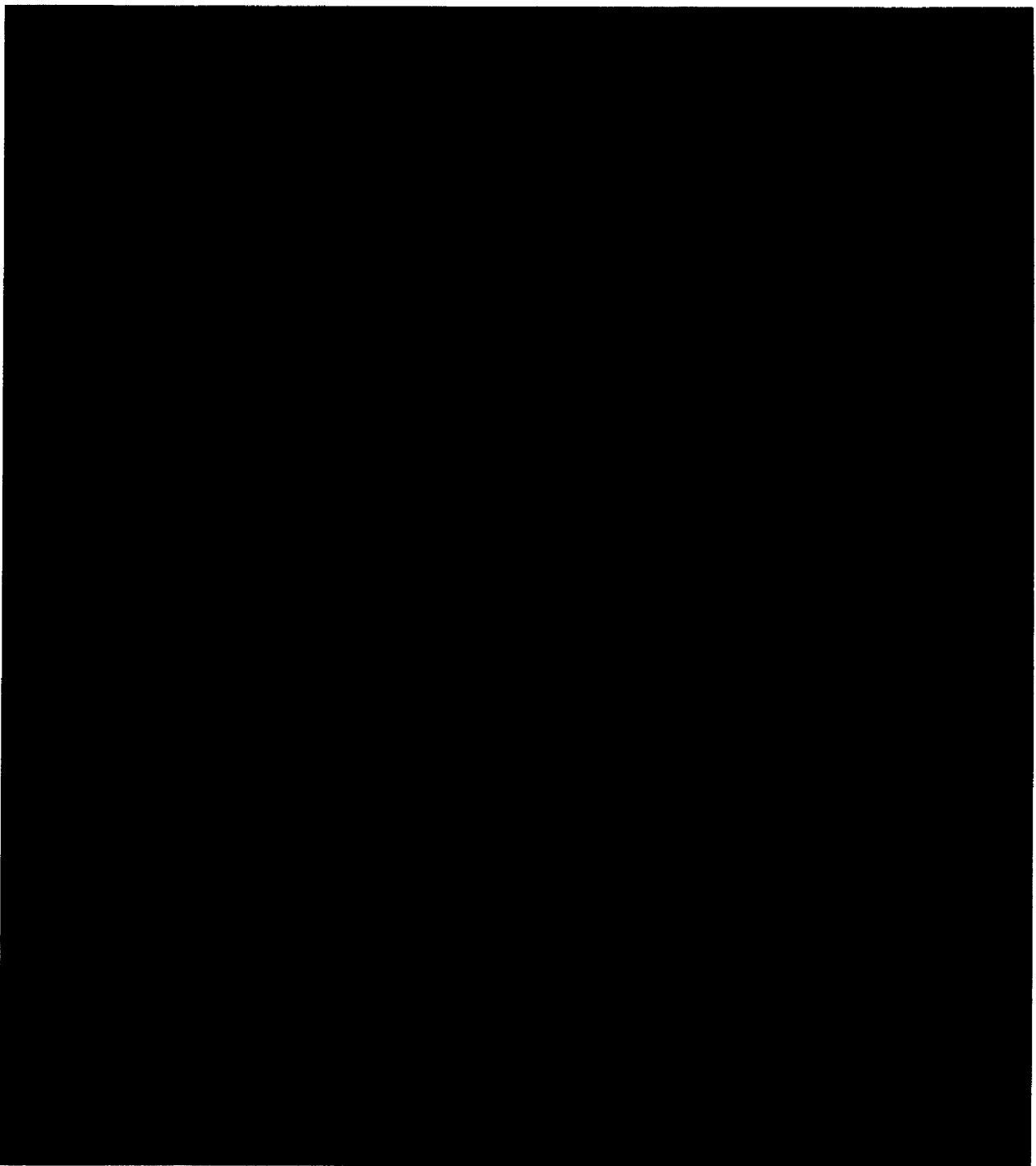
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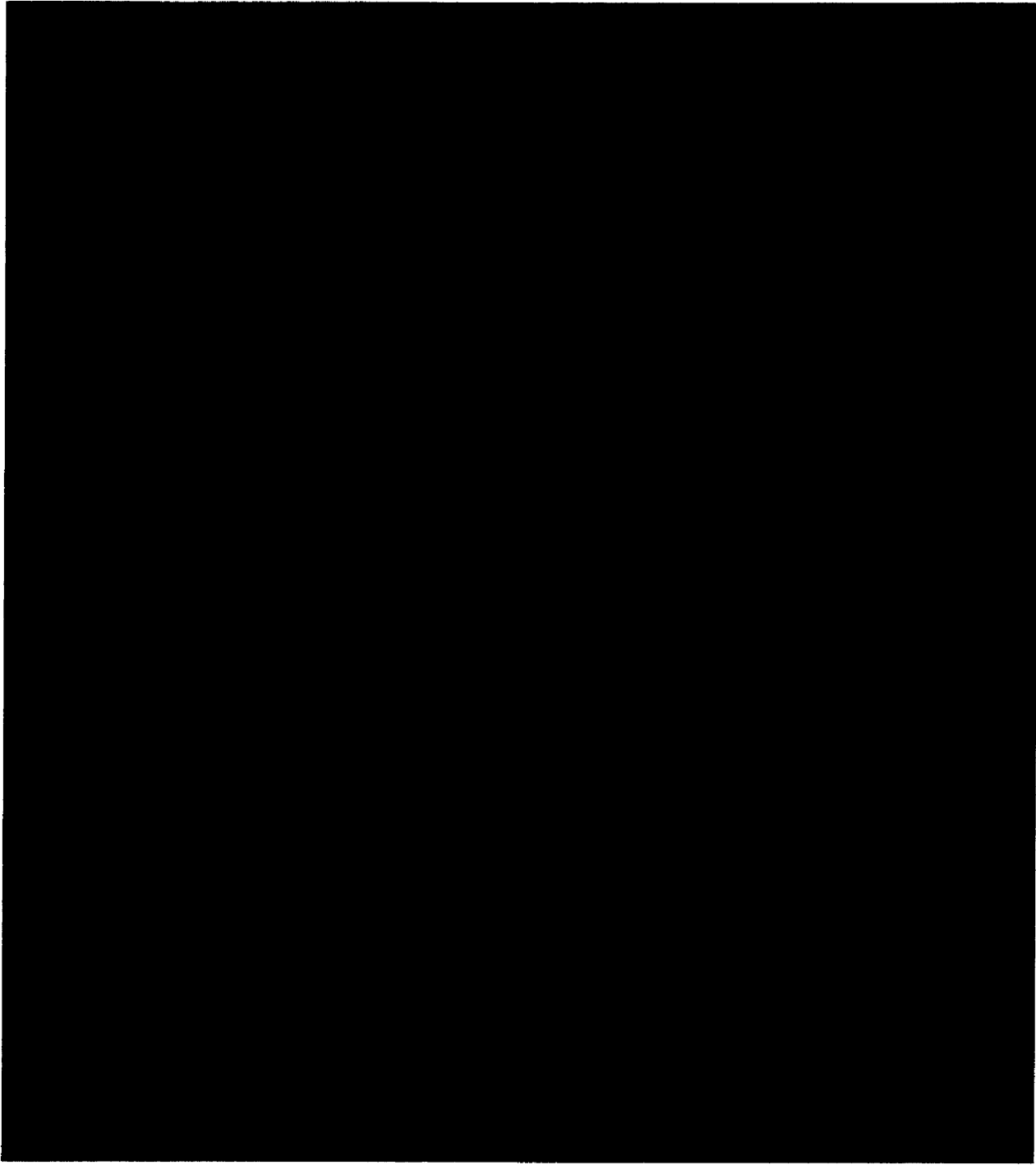
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Response to Interrogatory 7(e) and 7(g)

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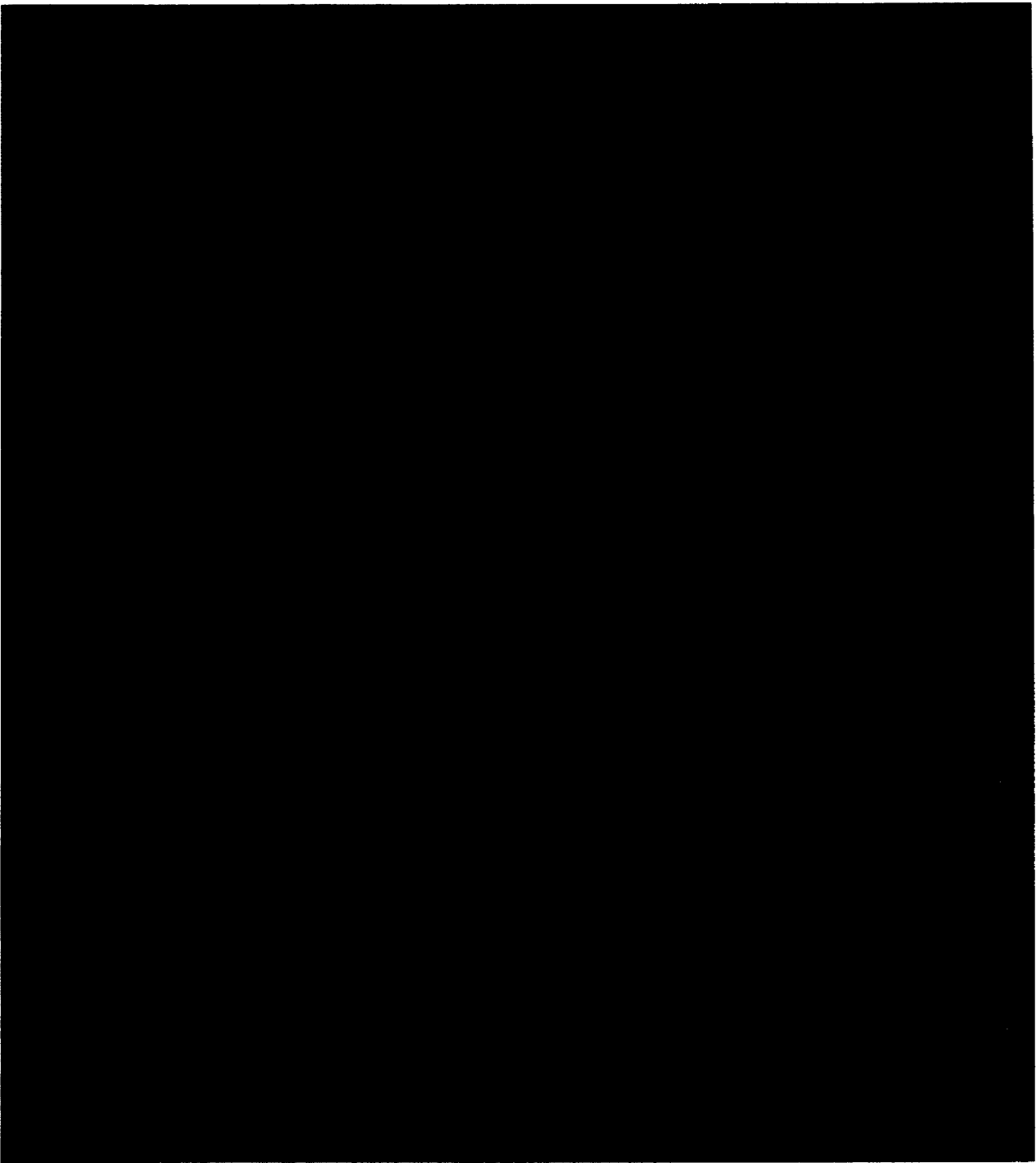
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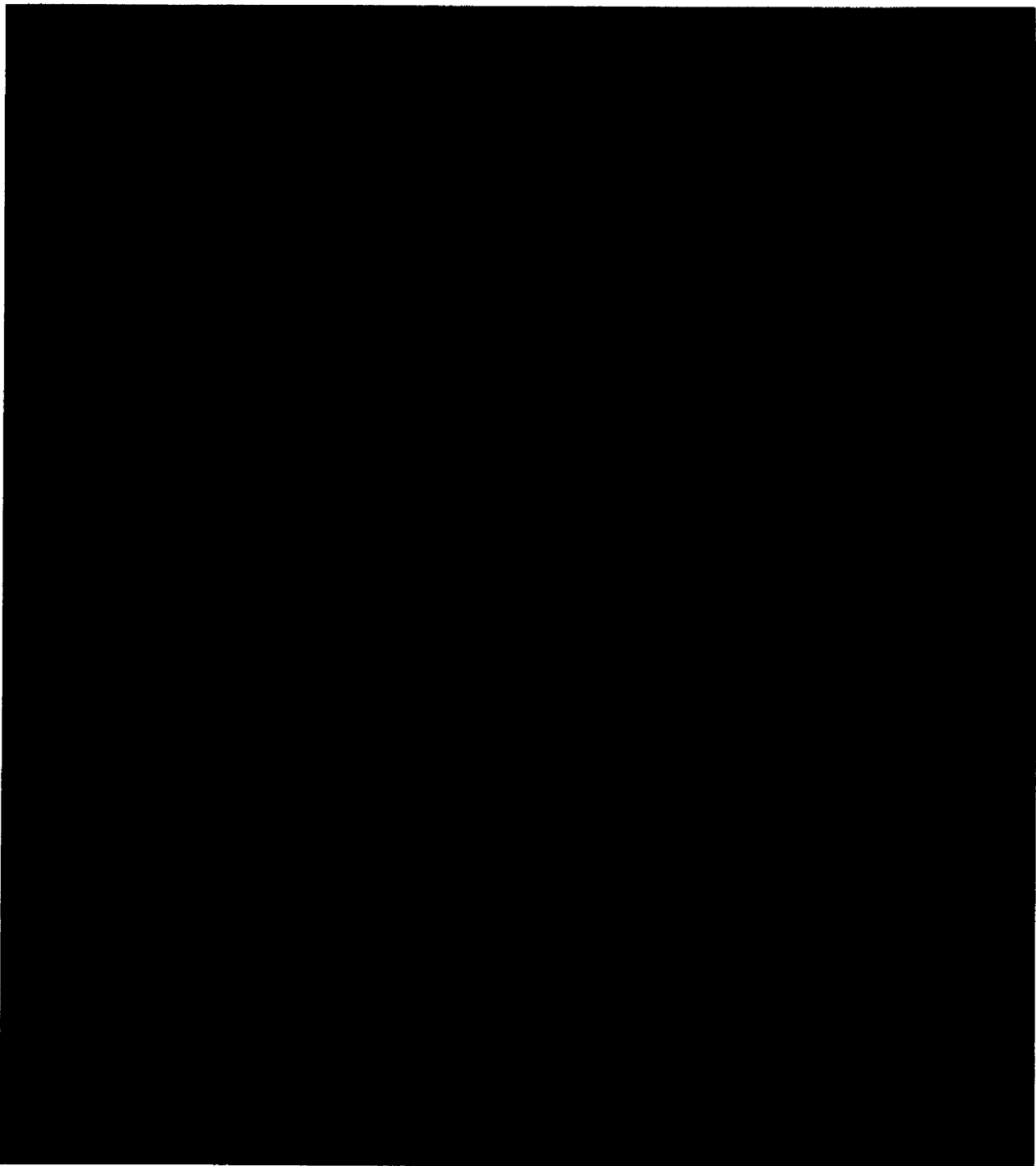
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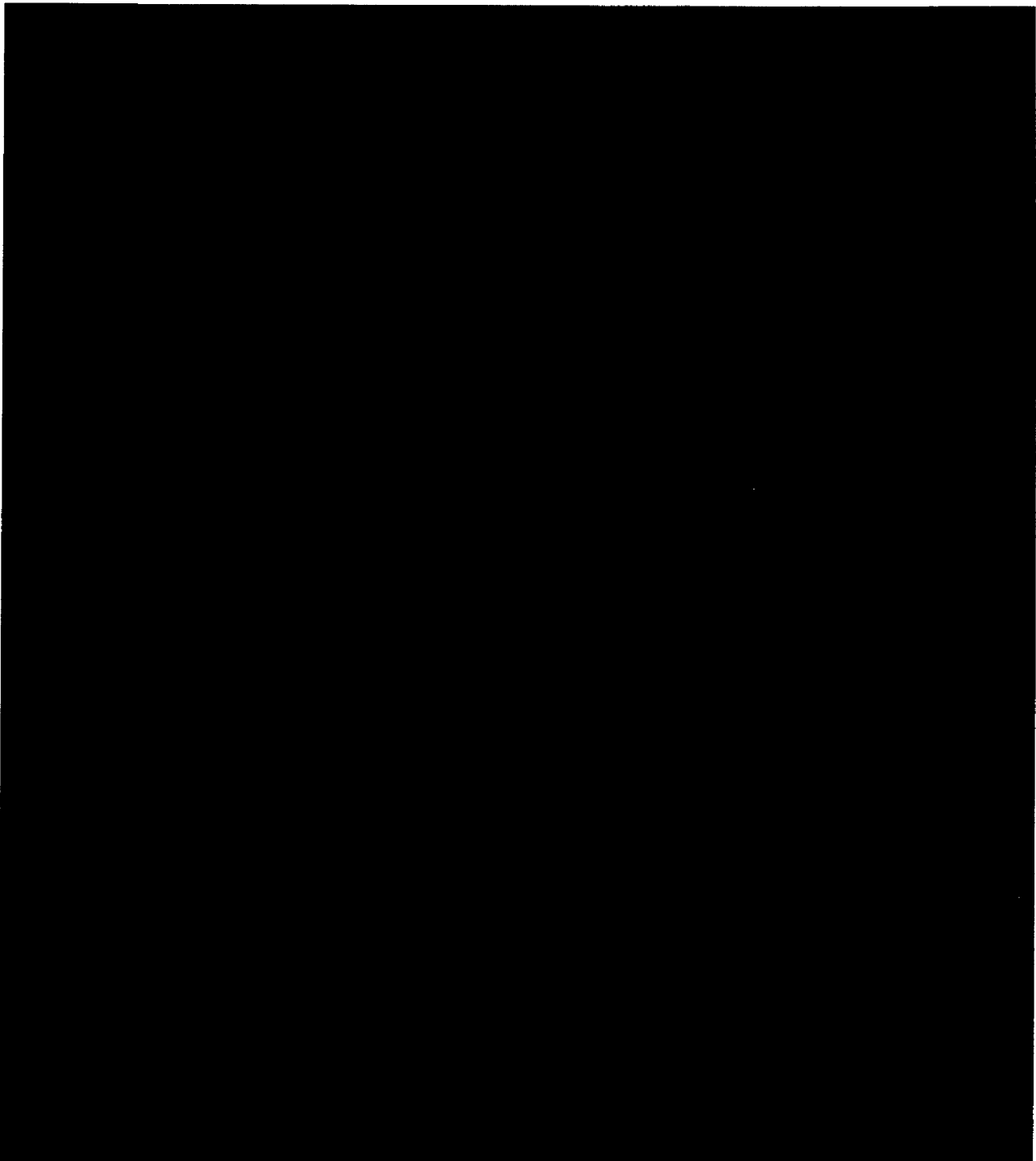
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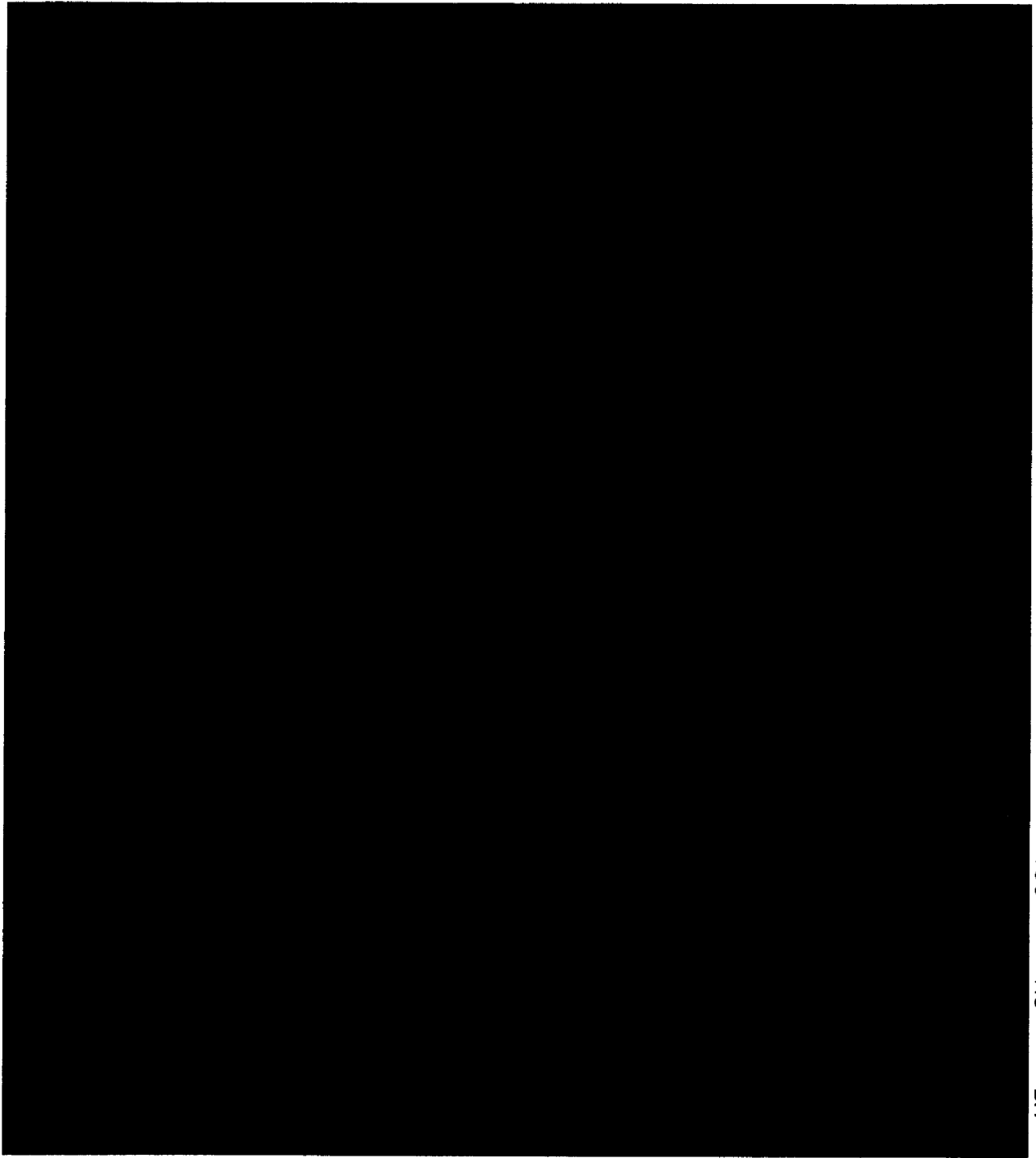
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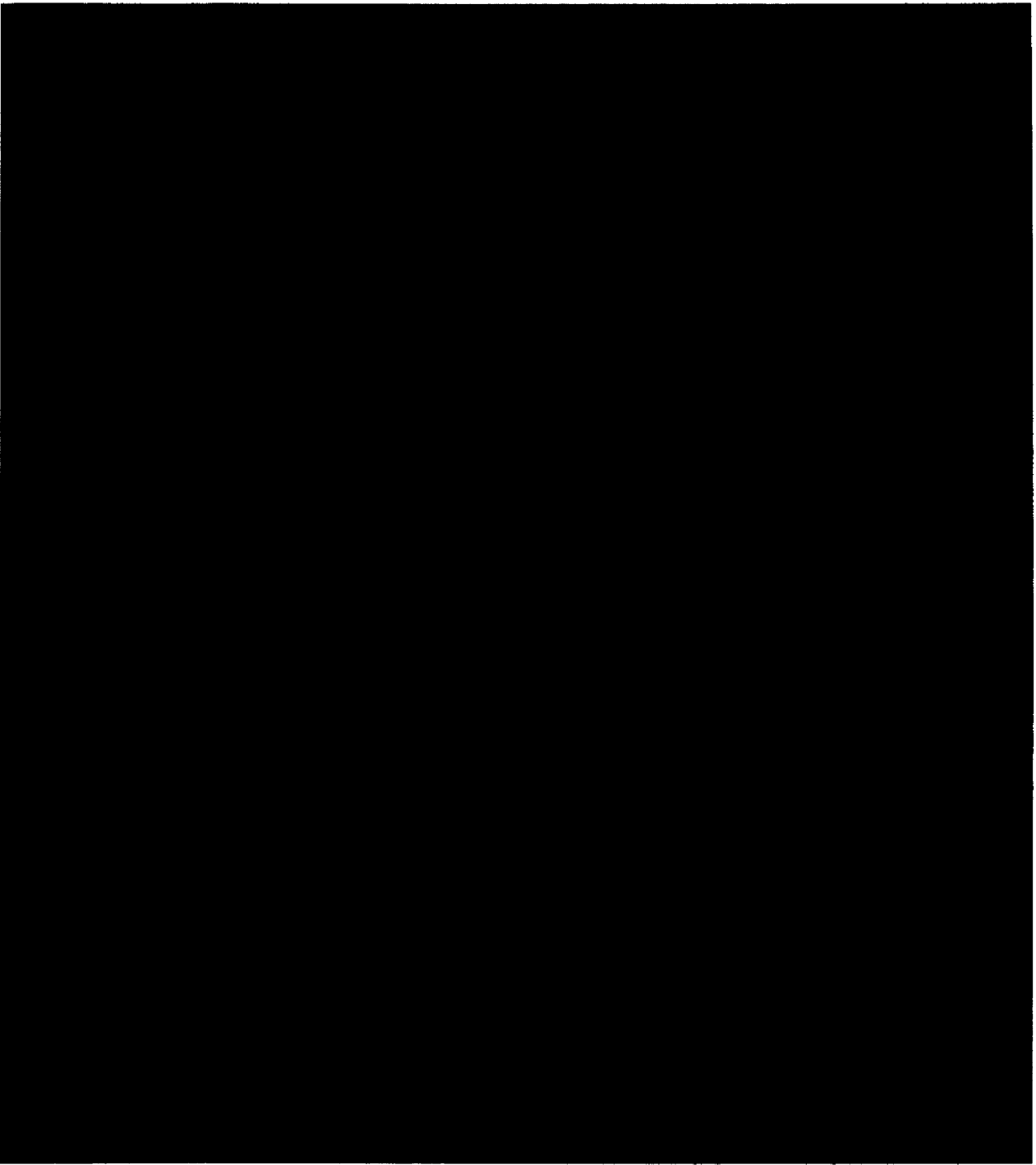
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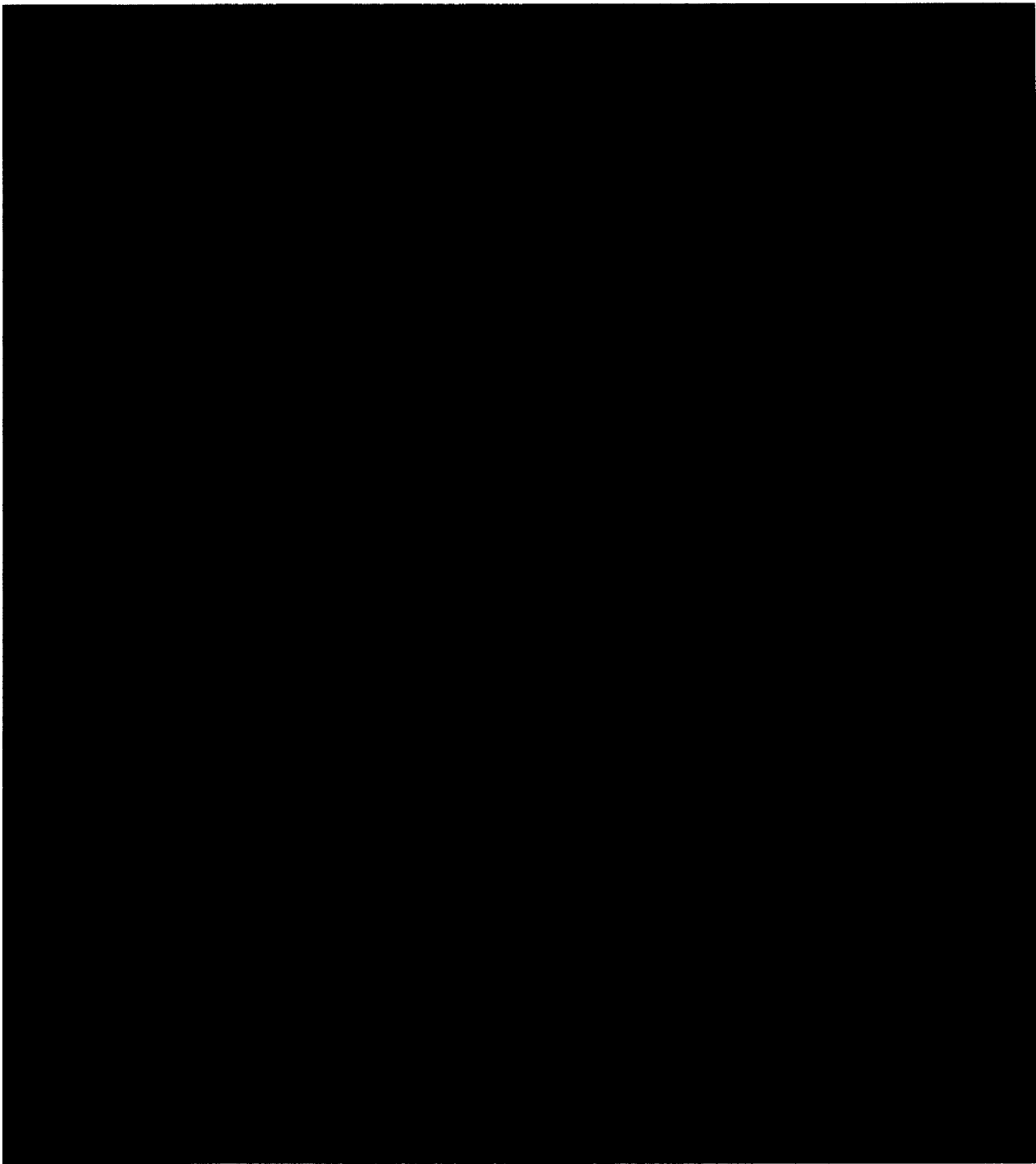
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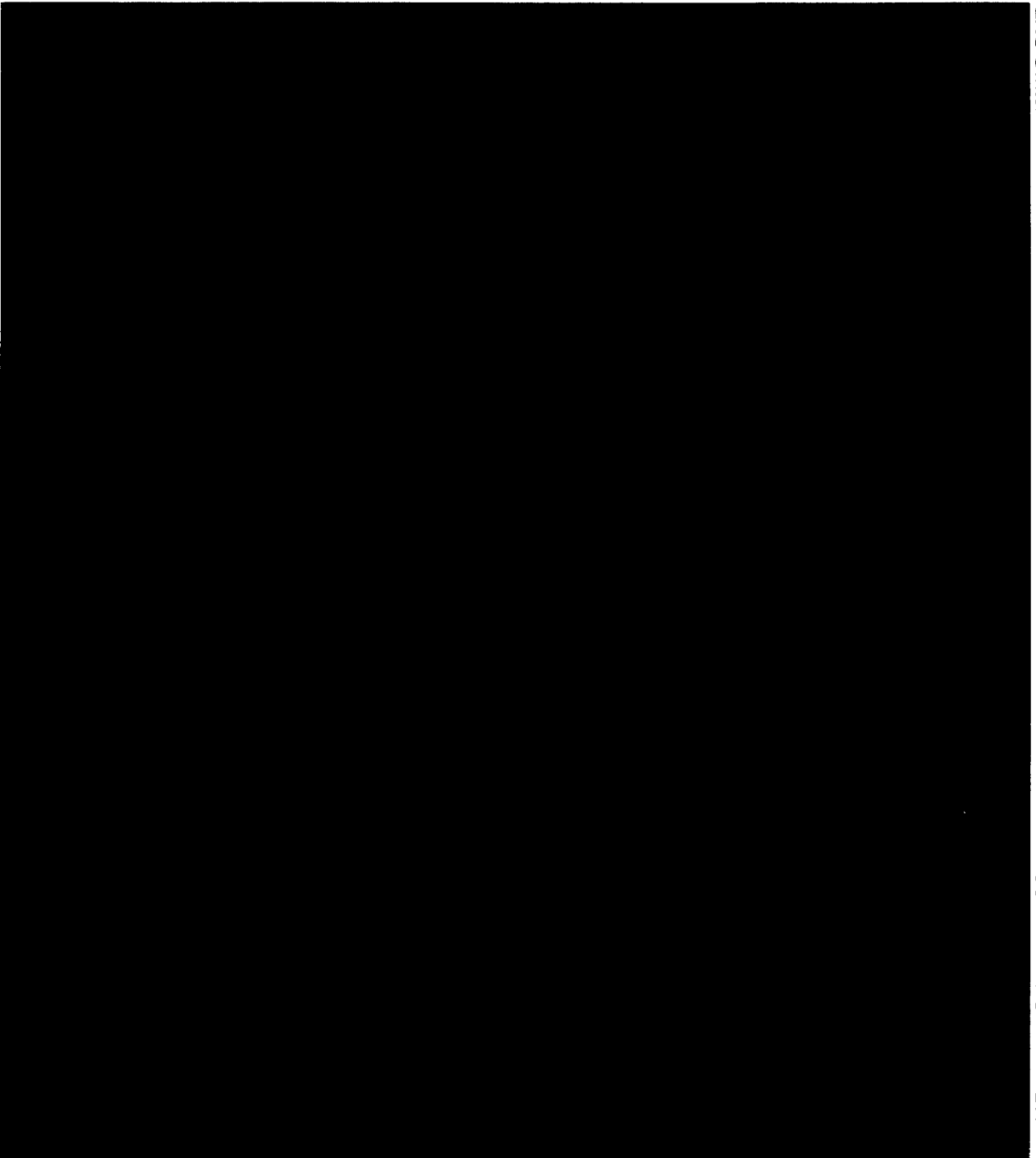
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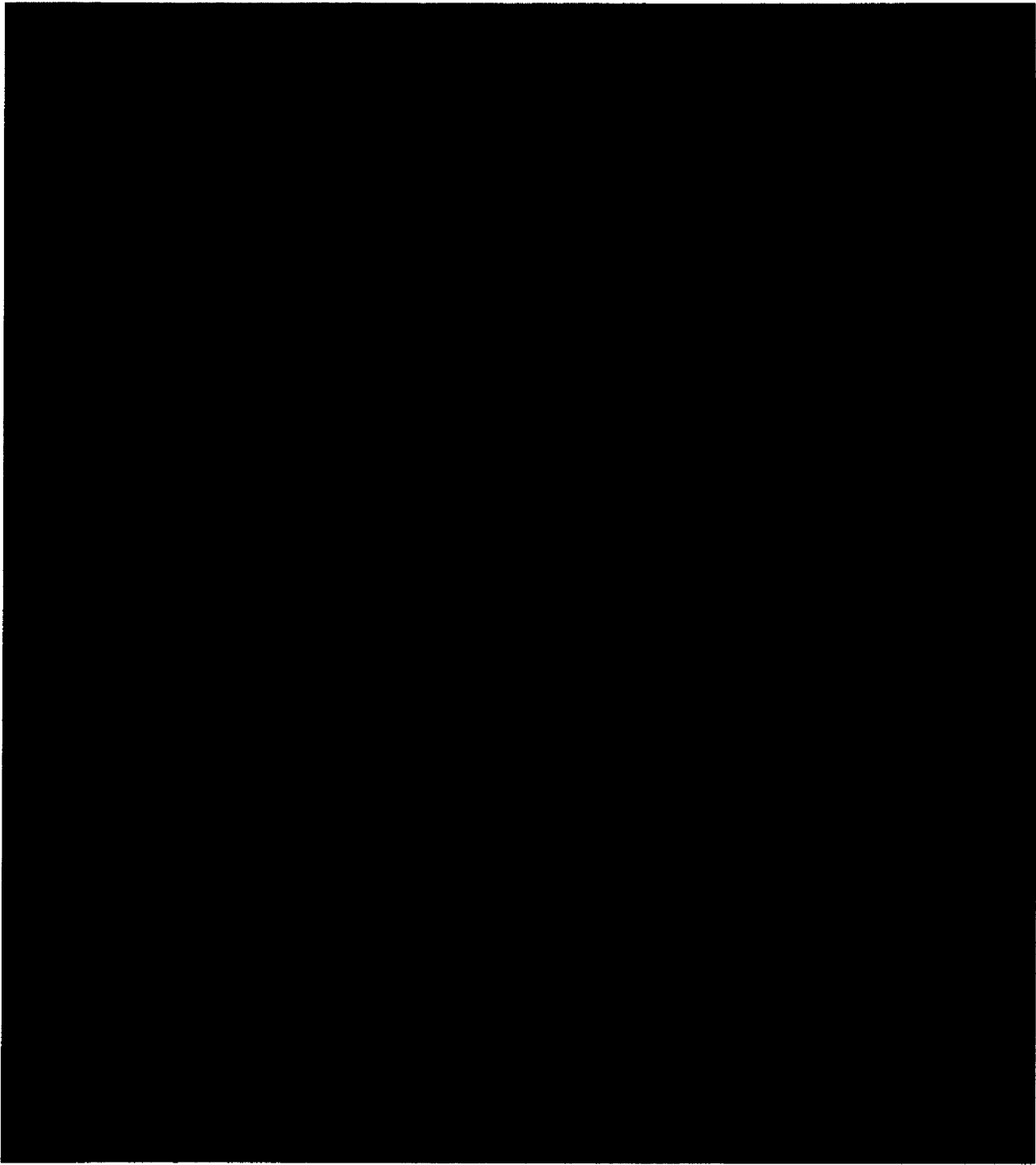
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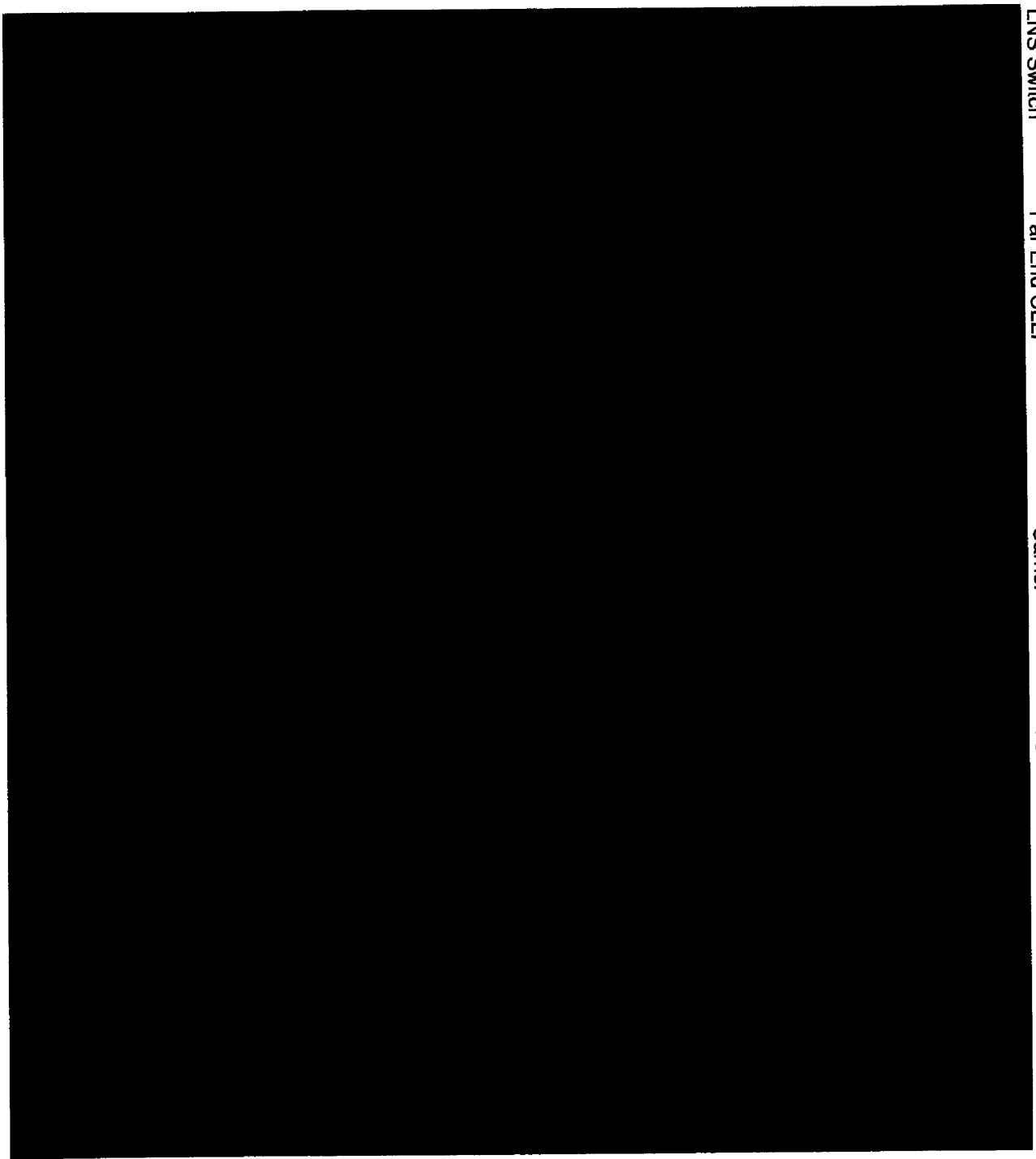
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