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June 21, 2006

Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 060300-TL

Dear Ms. Bayo:

HAND DELIVERY

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Enclosed for filing on behalf of GTC, Inc. d/b/a GT Com are the original and fifteen copies of GT Com's Request for Confidential Classification.

CMP	If you have any questions, please do not hesitate to contact me.	Thank you for your
COMassista	ance with this filing.	
CTR	Sincerely,	
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for recovery of intrastate costs)	
and expenses relating to repair, restoration)	Docket No. 060300-TP
and replacement of facilities damaged by Hurricane)	
Dennis by GTC, Inc. d/b/a GT Com		Filed: June 21, 2006
)	

GT COM'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

GTC Inc. d/b/a GT Com ("GT Com") by and through its undersigned counsel and pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification of certain documents and information as set forth below. As grounds for its request, GT Com States as follows:

- 1. On March 31, 2006, GT Com filed its Petition in the instant docket. Thereafter GT Com was served with and provided responses to Staff's First Set of Interrogatories, Nos. 1-28, and Staff's First Request for Production of Documents, Nos. 1-4.
- 2. As set forth more specifically below, certain information and documents provided by GT Com in response to Staff's Interrogatories Nos. 2 and 13 and Staff's Request for Production of Documents No. 2 constitute proprietary confidential business information for which GT Com requests confidential classification. GT Com filed its Notice of Intent to Claim Specified Confidential Classification of such information and documents on May 31, 2006.
- 3. Section 364.183, Florida Statutes, provides that information which meets certain criteria is exempt from public disclosure under §119.07, Florida Statutes. Pursuant to §364.183, confidential proprietary business information is defined as follows:

The term "proprietary confidential business information" means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that

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provides that the information will not be released to the public. The 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, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications or responsibilities.

Pursuant to §364.183, Florida Statutes, GT Com requests confidential classification of the information and documents described below.

GT Com's Response to Staff Interrogatory No. 2

- 4. On May 31, 2006, GT Com filed and served its redacted Response to Staff Interrogatory No. 2, as shown in Public Exhibit "A" hereto.
- 5. Contemporaneously with its redacted Response, GT Com filed and served its Notice of Intent to Seek Confidential Classification thereof and filed a copy of the confidential (unredacted) Response under confidential cover. Attached in Confidential Exhibit "B" is a copy of the confidential version of GT Com's Response with confidential information highlighted.
- 6. The information redacted from Lines 5 and 7 of GT Com's Response to Staff Interrogatory No. 2 reveals GT Com's benefits-to-payroll ratio. This information is proprietary confidential business information pursuant to §364.183(3)(e), Florida Statutes, in that it is information relating to GT Com's competitive interests, the disclosure of which would impair the Company's competitive business. This information, if disclosed, would provide competitors with valuable information regarding GT Com's internal costs and cost structure, giving such competitors an artificial advantage in their competition with GT Com.

7. The information redacted from Lines 5 and 7 constitutes confidential proprietary business information belonging to GT Com, which is owned and controlled by GT Com, is intended to be and is treated by the Company as private in that the disclosure of such information would cause harm to the Company's business operations, and has not been previously disclosed. Accordingly, the Commission should determine that this information is proprietary confidential business information pursuant to §364.183, Florida Statutes, and exempt from the public disclosure requirements of §119.07, Florida Statutes.

GT Com's Response to Staff Interrogatory No. 13

- 8. On May 31, 2006, GT Com filed and served its redacted Response to Staff Interrogatory No. 13, as shown in Public Exhibit "A" hereto.
- 9. Contemporaneously with its redacted Response, GT Com filed and served its Notice of Intent to Seek Confidential Classification thereof and filed a copy of the confidential (unredacted) Response under confidential cover. Attached in Confidential Exhibit "B" is a copy of the confidential version of GT Com's Response with confidential information highlighted.
- 10. Staff's Interrogatory No. 13 seeks reconciliation between various sources of information regarding the number of access lines served by GT Com and the number of access lines reported by GT Com in this docket. GT Com's Response indicates that the difference is attributable to the items set forth in Lines 1 though 7, Column 1, in the amounts shown in Lines 1 through 7, Columns 2 through 5. This information is proprietary confidential business information pursuant to §364.183(3)(e), Florida Statutes, in that it is information relating to GT Com's competitive interests, the disclosure of which would impair the Company's competitive business. This information, if disclosed, would provide competitors with valuable information regarding market penetration of certain services as well as the effect of competitive activity in GT Com's service territory, giving such competitors an artificial advantage in their competition with GT Com. Given the small number of access lines served by GT Com, disclosure of any part

of the redacted information would permit competitors to estimate the remaining information, to GT Com's competitive disadvantage.

11. The information redacted from Lines 1 through 7 of GT Com's Response constitutes confidential proprietary business information belonging to GT Com, which is owned and controlled by GT Com, is intended to be and is treated by the Company as private in that the disclosure of such information would cause harm to the Company's business operations, and has not been previously disclosed. Accordingly, the Commission should determine that this information is proprietary confidential business information pursuant to §364.183, Florida Statutes, and exempt from the public disclosure requirements of §119.07, Florida Statutes.

GT Com's Response to Staff Request for Production of Documents No. 2

- 12. On May 31, 2006, GT Com filed and served its Response to Staff Request for Production of Documents No. 2. Contemporaneously with its Response, GT Com filed and served its Notice of Intent to Seek Confidential Classification of confidential documents referenced in its Response and filed a copy of the unredacted Response under confidential cover.
- 13. A public (redacted) version of documents provided by GT Com in response to Staff Request for Production of Documents No. 2 is shown in Public Exhibit "A" hereto. A confidential (unredacted) copy of such documents with confidential information highlighted is shown in Confidential Exhibit "B" hereto.
- 14. The documents produced by GT Com in response to Staff's Request for Production of Documents No. 2 consist of a private contract between GT Com and Tracom, Incorporated and several addenda thereto. The redacted information is proprietary confidential business information pursuant to §364.183(3)(d) and (e), Florida Statutes, in that it constitutes information concerning bids or other contractual data, the disclosure of which would impair the efforts of the Company to contract for goods or services on favorable terms and information relating to GT Com's competitive interests, the disclosure of which would impair the Company's competitive business. This information, if disclosed, would provide potential vendors with

valuable information regarding prices GT Com has been willing to pay for various services and would provide competitors with valuable information regarding GT Com's internal costs and cost structure, thereby giving vendors and competitors an artificial advantage in their negotiations or competition with GT Com.

- 15. The confidential information in GT Com's Response to Staff's Request for Production of Documents No. 2, as shown in Confidential Attachment "A," constitutes confidential proprietary business information belonging to GT Com, which is owned and controlled by GT Com, is intended to be and is treated by the Company as private in that the disclosure of such information would cause harm to the Company's business operations, and has not been previously disclosed. Accordingly, the Commission should determine that this information is proprietary confidential business information pursuant to §364.183, Florida Statutes, and exempt from the public disclosure requirements of §119.07, Florida Statutes. Accordingly, the Commission should determine that this information is proprietary confidential business information pursuant to §364.183, Florida Statutes, and exempt from the public disclosure requirements of §119.07, Florida Statutes.
- 16. Upon a finding that the information highlighted in Exhibit A is proprietary confidential business information, such information should not be declassified for a period of at least eighteen months pursuant to §364.183, Florida Statutes, and should be returned to GT Com as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE GT Com respectfully requests that the Commission grant this Request for Confidential Classification.

Respectfully submitted this 21st day of June, 2006.

Kenneth A. Hoffman, Esq.

Marsha E. Rule, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, Florida 32302 Telephone: 850-681-6788

Attorneys for GTC Inc. d/b/a GT Com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. mail this 21st day of June, 2006, to the following:

Florida Public Service Commission Adam Teitzman, Esq. 2450 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ateitzman@psc.state.fl.us

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Attorney