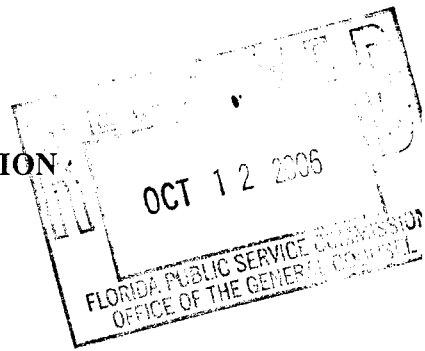


ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



In re: Complaint by BellSouth)
 Telecommunications, Inc., Regarding)
 The Operation of a Telecommunications)
 Company by Miami-Dade County in)
 Violation of Florida Statutes and)
 Commission Rules)

Docket No. 050257 -TL

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MIAMI-DADE COUNTY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006(4), F.A.C., Miami-Dade County (the "County"), by and through its undersigned counsel, hereby requests the confidential classification of the entire document bates stamped MDC_PSC(4) 00001 (the "Confidential Document"), which delineates its current list of customers, and was requested for production by the Florida Public Service Commission Staff ("Staff") and BellSouth Telecommunications, Inc. ("BellSouth") in this matter. In support of its request for confidential classification, the County states:

1. The Confidential Document constitutes a trade secret. § 812.081, Fla. Stat. (2005). "[T]rade secret information as defined in s. 812.081, and as provided for in s. 815.04(3), [is] expressly made confidential and exempt from the public records law" § 815.045, Fla. Stat.

CMP 1 (2005). The Confidential Document qualifies for protection as proprietary confidential business information pursuant to § 364.183(3)(a), Florida Statutes.

CTR _____
 ECR _____
 GCL 1 2. *The Confidential Document is (i) confidential and exempt, (ii) intended to be and is treated by the County as private, and (iii) has not been disclosed.*

OPC _____
 RCA _____
 SCR _____
 SGA _____
 SEC 1

OTH 1 *collected records*
 (Data\dsh\Pleadings\Airport\BellSouth Telecommunications (PSC Request for Confidential Classification).DOC)

DOCUMENT NUMBER-DAT
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FPSC-COMMISSION CLERK

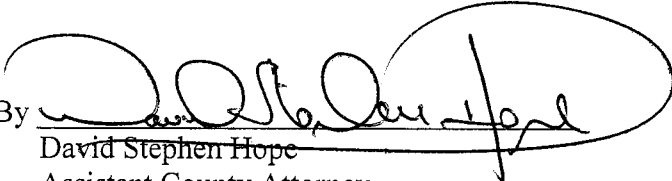
3. The Confidential Document is stamped “CONFIDENTIAL”, and has only been produced to: (i) the Florida Public Service Commission (“PSC”) Staff on July 3, 2006, in response to Staff’s First Request for Production, and with the specific instruction that “[t]he County’s current list of customers is confidential and exempt, and is not to be disclosed to third parties or non-Florida Public Service Commission entities. See *Sepro Corp. v. Fla. Dep’t of Env’tl. Prot.*, 839 So. 2d 781, 784 (Fla. 1st DCA 2003), review denied sub nom by *Crist v. Fla. Dep’t of Env’tl. Prot.*, 911 So. 2d 792 (Fla. 2005) (emphasis added)[;]” and (ii) BellSouth on October 10, 2006, pursuant to the PSC’s Order No. PSC-06-0814-PCO-TL Governing the Handling of Confidential Information, dated October 3, 2006, and Order No. PSC-06-0815-PCO-TL Granting in Part and Denying in Part Motions to Strike and Extending Discovery Period, dated October 3, 2006, which subject the Confidential Document to the PSC’s Protective Order and required its immediate production to BellSouth.

RESPECTFULLY SUBMITTED,

MURRAY A. GREENBERG
MIAMI-DADE COUNTY ATTORNEY

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By


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed, this *11th*
day of October 2006, to:

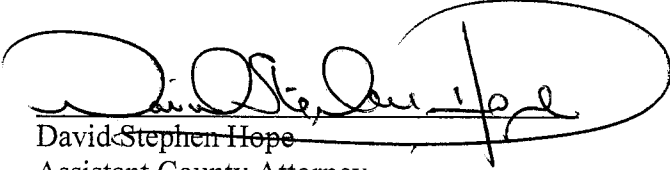
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