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Please refer to our file number: 02675-5

RECEIVED FPSC
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COMMISSION CLERK

March 27, 2007

Via Federal Express

Ms. Ann Cole, Commission Clerk
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: **Docket No. 060476-TL: Petition To Initiate Rulemaking To Amend Rules 25-24.630(1) and 25.24.516(1), F.A.C., by BellSouth Telecommunications, Inc.**

Dear Ms. Cole:

Enclosed is a Response to Staff Data Request and a Request for Confidential Classification and a Motion for Protective Order with regard to a March 19, 2007, Staff Data Request filed by Qwest Communications Corporation which we ask that you file in the captioned docket.

Very truly yours,

ABEL BAND, CHARTERED



William P. Cox

This confidentiality request was filed by or for a "telco" for DN 02676-02. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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- cc: Dale Buys, Florida Public Service Commission (via U.S. mail)
- Beth Salak, Florida Public Service Commission (via U.S. mail)
- Kira Scott, Esq., Florida Public Service Commission (via U.S. mail)
- Barbara J. Brohl, Esq., Qwest Communications Corporation (via U.S. mail and e-mail)
- Stacy Hanson, Qwest Communications Corporation (via U.S. mail and e-mail)
- Carolyn Vance, Qwest Communications Corporation (via e-mail)
- Jeffrey P. Wirtzfeld, Qwest Communications Corporation (via e-mail)

SARASOTA, FLORIDA VENICE, FLORIDA TALLAHASSEE, FLORIDA DENVER, COLORADO

ABEL BAND, CHARTERED

DOCUMENT NUMBER-DATE

02675 MAR 29 07

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF FLORIDA

In re: Petition to initiate rulemaking to amend) Docket No. 060476-TL
Rules 25-24.630(1) and 25-24.516(1), F.A.C.,)
By BellSouth Telecommunications, Inc.) Filed: March 27, 2007

QWEST COMMUNICATIONS CORPORATION's REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

Under Commission Rule 25-22.006, Florida Administrative Code, Qwest Communications Corporation (hereinafter "QCC" or "Qwest"), by and through its undersigned counsel, seeks confidential classification and a protective order from the Florida Public Service Commission ("Commission") for information contained in Confidential Attachment A to its response to Commission Staff Data Request dated March 19, 2007, in the above referenced docket. In support of its Request and Motion, QCC respectfully states as follows:

1. All of the information in Confidential Attachment A for which QCC seeks confidential treatment falls within Section 364.183, Florida Statutes, which defines "proprietary confidential business information" as:

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 provides that the information will not be released to the public.

Section 364.183(a), Florida Statutes, expressly provides that "trade secrets" fall within the definition of "proprietary confidential business information." Section 364.183(e), Florida Statutes, further provides that "proprietary confidential business information" includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

2. All of the cost and call count information contained in the spreadsheet in Confidential Attachment A is confidential and competitively sensitive information. This information pertains to QCC's costs for a completed operator-assisted call. This cost information is based on a completed call, regardless of 0+, 0-, or any billing method, *i.e.*, collect, third party, or person to person. The confidential information consists of internal cost information broken down by QCC department, total costs per month, completed call counts, and costs per call.

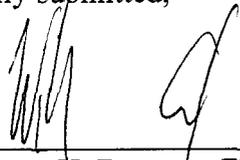
3. If competitors were able to acquire this detailed and sensitive information regarding QCC's operating and service costs associated with operator-assisted calls, they could more easily develop entry and marketing strategies to ensure success in competing with QCC. This would afford them an unfair advantage while severely jeopardizing QCC's competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer. Accordingly, QCC respectfully requests that the Commission classify the identified information as confidential and enter an appropriate protective order.

4. While a ruling on this request is pending, QCC understands that the information at issue is exempt from Section 119.07(1), Florida Statutes, and the Commission will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d), Florida Administrative Code.

5. One copy of the confidential information is attached to the original of QCC's Response to the aforementioned Staff Data Request as Confidential Attachment A. Two redacted or edited non-confidential copies of the same Confidential Attachment A are attached to QCC's Response as Attachment B.

DATED this 27rd day of March 2007.

Respectfully submitted,

By: 

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Attorneys for Qwest Communications Corporation

ATTACHMENT "B"

FLORIDA
Docket No. 060476-TL
PSC 01-001
Confidential Attachment A

QCC OS Income Analysis

Cost Dept.	Jan. 2006	Feb. 2006	Mar. 2006	Apr. 2006	May-06 Total	Mo. Avg.
Call Center						
Network						
LIDB Validation						
Customer Service						
Sales						
Engineering						
Billing & Collections						
Bad Debt (uncollectibles)						
Total Cost						

Completed Call Counts

Cost Per Call

ATTACHMENT "B"

FLORIDA
Docket No. 060476-TL
PSC 01-001
Confidential Attachment A

QCC OS Income Analysis

Cost Dept.	Jan. 2006	Feb. 2006	Mar. 2006	Apr. 2006	May-06 Total	Mo. Avg.
Call Center						
Network						
LIDB Validation						
Customer Service						
Sales						
Engineering						
Billing & Collections						
Bad Debt (uncollectibles)						
Total Cost						
Completed Call Counts						
Cost Per Call						

Florida
Docket No. 060476-TL
PSC 01-001

PARTY: Florida Public Service Commission Staff
REQUEST NO: 001

Please provide a written response and supporting documentation that demonstrates the cost to complete the following non-inmate intrastate telephone toll call:

0+automated non-person-to-person call for a fifteen (15) minute duration.

RESPONSE:

Qwest does not look at calls specifically by live operator vs. automated calls. Regarding the internal cost for running/managing the OS product, we divide that cost by completed billable calls, whereby we recognize revenue for the effort. Cost is based on a completed call, regardless of 0+ vs. 0- or any.

As an example, Confidential Attachment A is a high level cost study that was done for the first five months of 2006 and reflects the average cost per completed call.

Respondent: Carolyn Vance

Florida
Docket No. 060476-TL
PSC 01-002

PARTY: Florida Public Service Commission Staff

REQUEST NO: 002

Please provide a written response and supporting documentation that demonstrates the cost to complete the following non-inmate intrastate telephone toll call:

0+automated person-to-person call for a fifteen (15) minute duration.

RESPONSE:

Automated person-to-person does not exist as a live operator is required to ensure the receiving party is the party that the caller has specifically requested. An automated platform does not have the ability to do this.

Respondent: Carolyn Vance

Florida
Docket No. 060476-TL
PSC 01-003

PARTY: Florida Public Service Commission Staff
REQUEST NO: 003

Please provide a written response and supporting documentation that demonstrates the cost to complete the following non-inmate intrastate telephone toll call:

0+operator assisted non-person-to-person call for a fifteen (15) minute duration.

RESPONSE:

Please see Confidential Attachment A provided in response to PSC 01-001 which reflects the average cost per completed call for the 0+operator assisted non-person-to-person call for a fifteen (15) minute duration.

Respondent: Carolyn Vance

Florida
Docket No. 060476-TL
PSC 01-004

PARTY: Florida Public Service Commission Staff

REQUEST NO: 004

Please provide a written response and supporting documentation that demonstrates the cost to complete the following non-inmate intrastate telephone toll call:

0+operator assisted person-to-person call for a fifteen (15) minute duration.

RESPONSE:

Please see Confidential Attachment A provided in response to PSC 01-001 which reflects the average cost per completed call for the 0+operator assisted person-to-person call for a fifteen (15) minute duration.

Respondent: Carolyn Vance

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: 3/29/07
TO: Abel Law Firm / W. Cor.
FROM: R. Nettles, Division of the Commission Clerk &
Administrative Services
RE: **Acknowledgment of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket
No. 02676-07
060476 or (if filed in an undocketed matter) concerning
Response to data request, and
filed on behalf of Qwest Communications Corp.. The
document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850)
413-6770.

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