

ORIGINAL

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Legal Department

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Manuel A. Gurdian
Attorney

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

COMMISSION
CLERK

April 20, 2007

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 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 an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for portions of its Response to Staff's First Data Request, along with certain attachments provided in the response. We ask that you file this Request in the captioned docket

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

- CMP 1
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH 1 conf records

Sincerely,

Manuel A. Gurdian RN
Manuel A. Gurdian

cc: Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III
Beth Salak

This confidentiality request was filed by or for a "telco" for DN 03388-07. 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.
(x-ref. 02771-07)

RECEIVED & FILED

JH
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03387 APR 20 06

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 060476-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U. S. Mail this 20th day of April, 2007 to the following

Parties of Record:

Richard Bellak
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
rbellak@psc.state.fl.us

Abel Law Firm
Steven H. Denman
P.O. Box 49948
Sarasota, FL 34230-6948
Tel. No. (941) 366-6660
Fax. No. (941) 366-3999
sdenman@abelband.com

Florida Public Telecommunications
Assn., Inc. (FPTA)
Bruce W. Renard, Executive Director
9432 Baymeadows Road
Suite 140
Jacksonville, FL 32256
Tel. No. (904) 425-6050
Fax. No. (904) 425-6010
brenard@fpta.com


Manuel A. Gurdian

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by BellSouth Telecommunications,) Docket No.: 060476-TL
Inc. to Initiate Rulemaking to Amend Rules)
25-24.630(1) and 25-24.516(1), Florida)
Administrative Code)
_____) April 20, 2007

AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification and states as follow:

1. On March 30, 2007 AT&T Florida filed its Response to Staff's First Data Request, along with a Notice of Intent to Request Specified Confidential Classification.
2. AT&T Florida hereby files this Request for Specified Confidential Classification because portions of the above response, as well as attachments, contain confidential cost information. A more specific description of this information is contained in Attachment A.
3. The information should be classified as confidential and proprietary business information pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.
4. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the confidential and proprietary business information along with a list that identifies the location of the information designated by AT&T Florida as confidential.
5. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the documents containing the confidential information.
6. Attachment C to AT&T Florida's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

DOCUMENT NUMBER-DATE

03387 APR 20 5

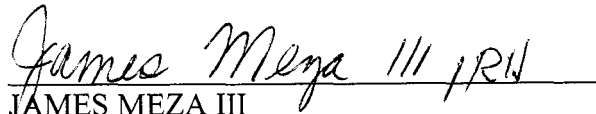
FPSC-COMMISSION CLERK

7. The original of this Request was filed today with the Commission Clerk and a copy was served on the Parties.

WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that the Commission enter an order declaring the information described above to be confidential and proprietary business information that is not subject to public disclosure.

Respectfully submitted this 20th day of April, 2007.

AT&T FLORIDA

 James Meza III /RN

JAMES MEZA III
AUTHORIZED HOUSE COUNSEL NO. 464260
MANUEL A. GURDIAN
AT&T Florida
c/o Nancy Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558

 E. Earl Edenfield, Jr. /RN

E. EARL EDENFIELD, JR.
AT&T Southeast
Suite 4300
675 W. Peachtree St., NE
Atlanta, GA 30375
(404) 335-0763

#674745

ATTACHMENT A

**AT&T Florida
FPSC Dkt No. 060476-TL
Request for Confidential Classification
Page 1 of 1
4/20/07**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST DATA REQUEST, FILED MARCH 30, 2007**

Explanation of Proprietary Information

1. This information contains cost information for the items under study. Public disclosure of this information would provide AT&T Florida's competitors with an advantage in that they would know AT&T Florida's costs for providing the service. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to AT&T Florida. This information is valuable, it is used by AT&T Florida in conducting its business and AT&T Florida strives to keep it secret. Therefore, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Section 364.183, Florida Statutes and is exempt from the Open Records Act.

Response to Data Request

<u>Location</u>	<u>Reason</u>
Page 2, Lines 1,3,4,7,8,13,15,16,19,20	1
Page 3, Lines 1,3,4,7,8	1

Response to Data Request ATTACHMENT

<u>Location</u>	<u>Reason</u>
Pages 1, 2 and 3, Direct Cost Columns	1

ATTACHMENT B

**AT&T Florida
FPSC Dkt No. 060476-TL
Request for Confidential Classification
Page 1 of 1
4/20/07**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST DATA REQUEST, FILED MARCH 30, 2007**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

RESPONSE: (Cont.)

Documents that support the operator services costs discussed below are proprietary and are being provided subject to a Notice of Intent.

1. 0+ automated non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for automated non-person to person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

2. 0+ automated person-to-person call for a fifteen (15) minute duration.

AT&T Florida does not provide this type of call.

3. 0+ operator assisted non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for non-person-to-person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

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RESPONSE: (Cont.)

4. 0+ operator assisted person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for person-to-person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

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RESPONSE PROVIDED BY: Doug Coutee
Manager-Lines of Business
Operator Services

3/28/2007

Recurring Cost Summary

BellSouth
OPH - NON PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OPERATOR LABOR		
BST LIDB - ADMIN.		
BST LIDB - FRAUD CENTER		
OTHER EXPENSES:		
OPERATOR LAND & BUILDING		
LIDB		
Cost Subtotal (Including Shared Cost)		
Gross Receipts Tax Factor	X	X
TSLRIC		
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

7

3/28/2007

Recurring Cost Summary

BellSouth
OPH - PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OPERATOR LABOR		
BST LIDB - ADMIN.		
BST LIDB - FRAUD CENTER		
OTHER EXPENSES:		
OPERATOR LAND & BUILDING		
LIDB		
Cost Subtotal (Including Shared Cost)		
Gross Receipts Tax Factor	X	X
TSLRIC		
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

2

3/28/2007

Recurring Cost Summary

**BellSouth
MAH MACHINE HANDLED COST PER CALL
(Adjusted Cost Study)**

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OTHER EXPENSES:		
LIDB		
Cost Subtotal (Including Shared Cost)		
Gross Receipts Tax Factor	X	X
TSLRIC		
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

Source: BSCC 2.7

3

RESPONSE: (Cont.)

Documents that support the operator services costs discussed below are proprietary and are being provided subject to a Notice of Intent.

1. 0+ automated non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for automated non-person to person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

2. 0+ automated person-to-person call for a fifteen (15) minute duration.

AT&T Florida does not provide this type of call.

3. 0+ operator assisted non-person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for non-person-to-person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

Handwritten notes on the right margin: "TMS" at the top, followed by a vertical list of numbers: 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20.

RESPONSE: (Cont.)

4. 0+ operator assisted person-to-person call for a fifteen (15) minute duration.

The operator services cost for this type of call is [REDACTED] per call. The remainder of the cost for the completion of the intrastate toll call would be the imputed access charges which would be [REDACTED]

As indicated above, approximately one out of seven calls is a billable call. Therefore, AT&T Florida's operator services cost per billable call for person-to-person is approximately [REDACTED] per call plus approximately [REDACTED] for the toll portion of the call.

FNMS
5
9-2-08

RESPONSE PROVIDED BY: Doug Coutee
Manager-Lines of Business
Operator Services

3/28/2007

Recurring Cost Summary

BellSouth
OPH - NON PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OPERATOR LABOR		
BST LIDB - ADMIN.		
BST LIDB - FRAUD CENTER		
OTHER EXPENSES:		
OPERATOR LAND & BUILDING		
LIDB		
Cost Subtotal (Including Shared Cost)		
Gross Receipts Tax Factor	X	X
TSLRIC		
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

7

3/28/2007

Recurring Cost Summary

BellSouth
OPH - PERSON-TO-PERSON OPERATOR HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OPERATOR LABOR		
BST LIDB - ADMIN.		
BST LIDB - FRAUD CENTER		
OTHER EXPENSES:		
OPERATOR LAND & BUILDING		
LIDB		
Cost Subtotal (Including Shared Cost)		
Gross Receipts Tax Factor	X	X
TSLRIC		
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

2

3/28/2007

Recurring Cost Summary

BellSouth
MAH MACHINE HANDLED COST PER CALL
(Adjusted Cost Study)

<u>Description</u>	<u>Volume Sensitive</u>	<u>Volume Insensitive</u>
	<u>Direct Cost</u>	<u>Direct Cost</u>
Recurring Cost Development Reports		
LABOR EXPENSES:		
OTHER EXPENSES:		
LIDB		
Cost Subtotal (Including Shared Cost)	=====	=====
Gross Receipts Tax Factor	X	X
TSLRIC	=====	=====
TOTAL TSLRIC	\$	
Overhead Loading Factor		
TOTAL COSTS W/OVERHEAD	\$	

PRIVATE/PROPRIETARY/SECURE

No disclosure outside BellSouth except by written agreement. Must be securely stored when not in use.

Source: BSCC 2.7

3

ATTACHMENT C

**AT&T Florida
FPSC Dkt No. 060476-TL
Request for Confidential Classification
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST DATA REQUEST, FILED MARCH 30, 2007**

ONE HIGHLIGHTED COPY

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: 4.20.07
TO: Manuel Gurdian
FROM: T. Henry, Division of the Commission Clerk &
Administrative Services
RE: **Acknowledgment of Receipt of Confidential Filing**

03388-07

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 060476-TL or (if filed in an undocketed matter) concerning Staff's 1st data request, and filed on behalf of AT & T Florida / Gurdian. 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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