ORIGINAL

Legal Department

JENNIFER S. KAY Senior Operations Counsel - Florida

AT&T Florida 150 South Monroe Street Room 400 Tallahassee, Florida 32301 (305) 347-5332

July 3, 2007

Ann Cole Commission Clerk Florida Public Service commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

UNDOCKETED

Re: AT&T Florida's Supplement to Response to the 2007 Storm Preparedness Data Request

Dear Ms. Cole:

On May 11, 2007, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") submitted its response (including exhibits) to the Florida Public Service Commission Staff's 2007 Storm Preparedness Data Request (the "Storm Data Response") under a claim of confidentiality. On June 15, 2007, AT&T Florida narrowed its claim of confidentiality to certain information contained in the Storm Data Response, and submitted two (2) redacted copies and one (1) highlighted copy of the Storm Data Response.

		highlighted copy of the Storm Data Response.
CMP		
COM		In item 8 of the Storm Data Response, AT&T Florida referenced a
CTR		spreadsheet outlining certain data the company uses to evaluate network reliability, which AT&T Florida attached as Exhibit 9. At the time of the original
ECR		filing, AT&T Florida did not have results for the last four measures on the
		spreadsheet and indicated that it would supplement Exhibit 9 at a later date.
3CL		AT&T Florida submits an updated Exhibit 9 which contains this
OPC		supplemental data under the same claim of confidentiality set forth in its June 15,
RCA		
SCR		document is in locked storage pending advisors to the
SGA		To access the material, your name must be on the CASR. If undocketed, your division director must provide written permission before you can access it.
SEC		
ОТН	LCOA	& Ledacted Confidential Claim
Ì	record	SODOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE DOCUMENT NUMBER DATE

FPSC-COMMISSION CLERK

05575 JUL-35

FPSC-COMMISSION CLERK

05576 JUL-38

FPSC-COMMISSION CLERK

05574 JUL-3 8

2007 letter to you. Two (2) redacted copies and one (1) highlighted copy of the updated Exhibit 9 to the Storm Data Response is attached.

Sincerely, January D. Kay/RN Jennifer S. Kay

Enclosure

Ms. Lisa Harvey (w/o proprietary enclosure) CC:

Ms. Beth Salak (w/o proprietary enclosure)

ATTACHMENT A

AT&T Florida
Supplement to Response to FPSC's 2007 Storm Preparedness Data Request
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AT8T FLORIDA'S SUPPLEMENT TO RESPONSE TO FPSC'S 2007 STORM PREPAREDNESS DATA REQUEST

Explanation of Proprietary Information

- 1. This information consists of internal methods and procedures and is considered by BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") to be proprietary confidential business information within the scope of Section 364.183(3) of the Florida Statutes. The information is intended to be and is treated by AT&T Florida as private, and has not otherwise been disclosed to the public. Additionally, competitors of AT&T Florida should not be able, for no charge, to avail themselves of internal methods and procedures that AT&T Florida spent time and monetary resources to develop.
- 2. This information contains results on equipment/facility performance and is considered to be proprietary confidential business information within the scope of Section 364.183(3) of the Florida Statutes. The information is intended to be and is treated by AT&T Florida as private, and has not otherwise been disclosed to the public. Further, the disclosure of this information would cause harm to the Company's business operations as third parties may attempt to take the information out of context and use it to form a predicate for claims or lawsuits against the Company. To the extent a third party had a valid claim or lawsuit against the Company, that party would have the opportunity to seek this information through the discovery process in a legal action. AT&T Florida does not concede that such claims or lawsuits would have merit and, to the contrary, believes that its infrastructure has performed well in past storms.
- 3. This information is the product of an internal audit and, thus, is considered proprietary confidential business information by the Company within the scope of Section 364.183(3) of the Florida Statutes.
- 4. This information represents security measures, systems, or procedures related to storm preparedness and/or recovery efforts and, thus, is considered proprietary confidential business information by the Company within the scope of Section 364.183(3) of the Florida Statutes.

ATTACHMENT A AT&T Florida Supplement to Response to FPSC's 2007 Storm Preparedness Data Request Page 2 of 2 07/03/07

5. This information concerns contractual data, the disclosure of which would impair the efforts of AT&T Florida or its affiliates to contract for goods or services on favorable terms.

<u>LOCATION</u> <u>REASON</u>

Exhibit 9 (Columns A thru E, lines 1 and 4 thru 13)

2, 3

ATTACHMENT B

AT&T Florida
Supplement to Response to FPSC's 2007 Storm Preparedness Data Request
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AT&T FLORIDA'S SUPPLEMENT TO RESPONSE TO FPSC'S 2007 STORM PREPAREDNESS DATA REQUEST

TWO REDACTED COPIES

ATTACHMENT C
AT&T Florida
paredness Data Request

Supplement to Responses to FPSC's 2007 Storm Preparedness Data Request
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AT&T FLORIDA'S SUPPLEMENT TO RESPONSES TO FPSC'S 2007 STORM PREPAREDNESS DATA REQUEST

ONE HIGHLIGHTED COPY

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP

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STATE OF FLORIDA



Office of Commission Clerk Ann Cole Commission Clerk (850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

	DATE: July 3, 2007
TO:	Jennifer Kay, Attorney/At&T Florida
FROM:	Matilda Sanders, Office of Commission Clerk
RE:	Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number Undocketed or (if filed in an undocketed matter) concerning Response to 2007 Storm Preparedness Data Request -- Updated Exhibit 9 with supplemental data, and filed on behalf of At&T Florida. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-8770.

0000MENT NUMBER-CATE 05576 JUL-35

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