

Manuel A. Gurdian
Attorney

AT&T Florida
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(305) 347-5561

ORIGINAL

July 23, 2007

RECEIVED-FPSC
07 JUL 23 PM 4: 26
COMMISSION
CLERK

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

Re: Docket No.: 060822-TL
Petition of BellSouth Telecommunications, Inc. for Relief from
Carrier-of-Last-Resort Obligations (COLR) Pursuant to Florida
Statutes §364.025(6)(d) for two private subdivisions in Nocatee
development

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 its Response to Nocatee's First Set of Interrogatories No. 3 and Second Request for Production of Documents Nos. 3 and 4, which we ask that you file in the captioned docket.

Copies were served to the parties shown on the attached Certificate of Service.

Sincerely,

Manuel A. Gurdian
Manuel A. Gurdian

- CMP** _____
- COM** _____
- CTR** _____ Enclosures
- ECR** _____
- GCL** 2 cc: All Parties of Record
Jerry D. Hendrix
- OPC** _____ E. Earl Edenfield, Jr.
- RCA** _____ James Meza III
- SCR** _____
- SGA** _____
- SEC** _____
- OTH** 1 conf
records

This confidentiality request was filed by or for a "telco" for DN 06271-07. 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. 05964-07)

DOCUMENT NUMBER-DATE

06270 JUL 23 07

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

Docket No. 060822-TL

I HEREBY CERTIFY that a true and correct copy was served via (*) Electronic Mail, (**) Federal Express, (#) Hand Delivery and First Class U. S. Mail this 23rd day of July, 2007 to the following:

Florida Public Service Commission

Patrick Wiggins, Staff Counsel (*)(**)
Rick Mann, Staff Counsel (*)(**)
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
pwiggins@psc.state.fl.us
rmann@psc.state.fl.us

Nocatee Development Company

Attention: Richard T. Ray
4314 Pablo Oaks Court
Jacksonville, Florida 32224

Anne T. Klinepeter, Registered Agent
4314 Pablo Oaks Court
Jacksonville, FL 32224

The Parc Group, Inc.

Attention: Richard T. Ray
4314 Pablo Oaks Court
Jacksonville, Florida 32224

Anne T. Klinepeter, Registered Agent
4314 Pablo Oaks Court
Jacksonville, FL 32224

SONOC Company, LLC

Attention: Richard T. Ray
4310 Pablo Oaks Court
Jacksonville, Florida 32224

DDI, Inc., Registered Agent
4310 Pablo Oaks Court
Jacksonville, FL 32224

Toll Jacksonville Limited Partnership

250 Gibraltar Road
Horsham, PA 19044

CT Corporation System, Registered Agent
1200 South Pine Island Road
Plantation, FL 33324

Pulte Home Corporation

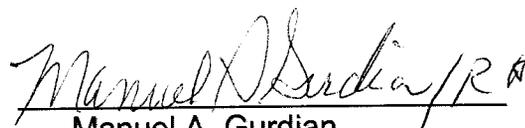
c/o Jane Celofsky, Legal Dept.
100 Bloomfield Hills Parkway
Suite 300
Bloomfield Hills, MI 48304

CT Corporation System, Registered Agent
1200 South Pine Island Road
Plantation, FL 33324

Nocatee Development Company/SONOC Company LLC

M. Lynn Pappas (*)
c/o Pappas Law Firm
245 Riverside Avenue, Suite 400
Jacksonville, FL 32202
Tel. No. (904) 353-1980
Fax No. (904) 353-5217
lpapas@papnet.com

Floyd R. Self (+)(*)(#)
Messer Caparello & Self, P.A.
Regional Center Office Park
2618 Centennial Place
P.O. Box 15579 (32317)
Tallahassee, FL 32308
Tel. No. (850) 222-0720
Fax. No. (850) 224-4359
fself@lawfla.com
Represents Nocatee


Manuel A. Gurdian

(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition of BellSouth for Relief from) Docket No: 060822-TL
Carrier-of-Last-Resort Obligations Pursuant)
To Florida Statutes §364.025(6)(d)) Filed: July 23, 2007
_____)

**AT&T FLORIDA'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files its Request for Specified Confidential Classification.

1. On July 13, 2007, AT&T Florida filed its Response to Nocatee Development Company, SONOC Company, LLC, Toll Hacksonville Limited Partnership, Pulte Home Corporation and Parc Group, Inc.'s (hereinafter collectively referred to as "Nocatee") First Set of Interrogatories (Nos. 1-11) and Second Request for Production of Documents (Nos. 3-4). Subsequent to filing its Response to Nocatee's discovery, AT&T Florida filed a Notice of Intent to Request Specified Confidential Classification, as AT&T Florida's Response to Nocatee's First Set of Interrogatories, No. 3 and the documents produced in Response to Request for Production Nos. 3 and 4 contain information that is confidential and proprietary to AT&T Florida.¹

2. Pursuant to Rule 25-22.06(3)(a), AT&T Florida hereby files this Request for Specified Confidential Classification because the information contained in AT&T Florida's Responses to Nocatee's First Set of Interrogatories No. 3 and First Request for

¹ AT&T Florida has withdrawn its claim of confidentiality for the document produced in AT&T Florida's Response to Nocatee's Second Request for Production, Item No. 3 referencing (Interrogatory 9b).

DOCUMENT NUMBER-DATE
06270 JUL 23 5
PSC-COMMISSION CLERK

Production Nos. 3 and 4 contain confidential business information related to competitive interests utilized by AT&T Florida to conduct its business. A more specific description of this information is contained in Attachment A. In addition, public disclosure of this information would cause harm to AT&T Florida. Therefore, such information should be classified as confidential 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.

3. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by AT&T Florida as confidential.

4. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the document containing the confidential information.

5. Attachment C to AT&T Florida's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

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

WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 23rd day of July, 2007.

AT&T FLORIDA

Handwritten signature of James Meza III in cursive, with a horizontal line underneath.

JAMES MEZA III
AUTHORIZED HOUSE COUNSEL NO. 464260
TRACY W. HATCH
MANUEL A. GURDIAN
c/o Nancy H. Sims
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) 347-5558

Handwritten signature of E. Earl Edenfield Jr. in cursive, with a horizontal line underneath.

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

685119

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 5
7/23/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL**

Explanation of Proprietary Information

1. This information contains competitive business information. The subject information includes internal network methods and procedures, network design standards and guidelines and/or job aids. This information is valuable, it is used by BellSouth in conducting its business and BellSouth 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(3)(e), Florida Statutes and is exempt from the Open Records Act.
2. This information contains confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to AT&T Florida's estimated costs for network deployment for this project and/or other projects that are not publicly available. This information further contains AT&T Florida's Network Cost Design jobs that provide information related to how AT&T Florida determines the cost of this project and/or other projects. These documents are not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A
AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 2 OF 5
7/23/2007

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL**

Explanation of Proprietary Information

3. This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Specifically, this information relates to what addresses in a development does AT&T Florida provide service and what type of service; telephone service, video service and/or data service. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

4. This information contains confidential, proprietary business information of BellSouth. BellSouth strives to keep this information confidential and not publicly disclose the information. This information contains detailed budget, accounting, financial and strategic information for BellSouth. Disclosure of revenue accounting and business costs could give competitors a clear picture of the resources required to provide services. Knowledge of such resource requirements could harm the competitive interests of BellSouth.

ATTACHMENT A

AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 3 OF 5
7/23/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL

Response to Interrogatory, Amended Item No. 3 (2nd)

<u>Location</u>	<u>Reason</u>
Page 2 of 3, All dollar amounts	2

POD NOs. 3 and 4 (Rog 3)

<u>Location</u>	<u>Reason</u>
Entire Document	2

POD NO. 3 (Rog 1)

<u>Location</u>	<u>Reason</u>
Entire Document	1

POD NO. 3 (Rog 1) (Austin Park)

<u>Location</u>	<u>Reason</u>
Entire Document	2

ATTACHMENT A

AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 4 OF 5
7/23/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL

POD NO. 3 (Rog 1) (Coastal Oaks)

<u>Location</u>	<u>Reason</u>
Entire Document	2

POD NO. 3 (Rog 1) (Riverwood)

<u>Location</u>	<u>Reason</u>
Entire Document	2

POD NO. 3 (Rog 1) (Willow Cove)

<u>Location</u>	<u>Reason</u>
Entire Document	2

POD NO. 3 (Rog 3)

<u>Location</u>	<u>Reason</u>
Entire Page	2

ATTACHMENT A

AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 5 OF 5
7/23/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL

POD NO. 3 (Rog 8)

<u>Location</u>	<u>Reason</u>
Last Three Columns	3

POD NO. 4 (Document 1)

<u>Location</u>	<u>Reason</u>
All numeric values, dollar amounts and percentages on Pages 1-5	4

POD NO. 4 (Document 2)

<u>Location</u>	<u>Reason</u>
Entire Document	2

ATTACHMENT B

**AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 1
7/23/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**AT&T FLORIDA
FPSC DOCKET NO. 060822-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 1
7/23/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO NOCATEE'S FIRST SET OF INTERROGATORIES NO. 3 AND
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 3 AND 4
FILED JULY 13, 2007 IN
FLORIDA DOCKET NO. 060822-TL**

ONE HIGHLIGHTED COPY

State of Florida



CONFIDENTIAL

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: 7/23/07. (4:30 p.m)
TO: AT+T / Guardian
FROM: Ruth 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. 060822 or (if filed in an undocketed matter) concerning responses to Nocateeb's 1st set of interrogatories, No 3 and and 2nd request for PODs, Nos. 3 and 4, and filed on behalf of AT+T. The document will be maintained in locked storage.

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

CONFIDENTIAL

I:\Confid\ackconf.doc