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August 30, 2007

RECEIVED - FPSC  
07 AUG 30 PM 4:23  
COMMISSION  
CLERK

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

**Re: Docket No. 050863-TP: dPi Teleconnect, L.L.C. v. BellSouth Telecommunications, Inc.**

Dear Ms. Cole:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for AT&T's responses to dPi's Request for Information, Nos. 1-3, 1-16, 1-17, and 1-22, which we ask that you file 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. A copy is being provided to the parties of record shown on the attached Certificate of Service.

Sincerely,

J. Phillip Carver

- CMP
- COM
- CTR
- ECR
- GCL
- OPC
- RCA
- SCR
- SGA
- SEC
- OTH

cc: All parties of record  
Chris Malish  
Jerry Hendrix  
James Meza III  
E. Earl Edenfield, Jr.

This confidentiality request was filed by or for a "telco" for DN 07863-07. 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. 07025-07)

1 copy records

DOCUMENT NUMBER-DATE

07863 AUG 30 07

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 050863-TP**

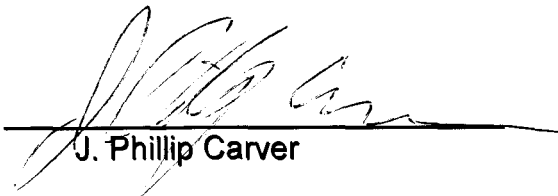
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and Federal Express this 30th day of August, 2007 to the following:

Theresa Tan  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)

Christopher Malish  
Foster Malish Blair & Cowan LLP  
1403 Weest Sixth Street  
Austin, TX 78703  
Tel. No. (512) 476-8591  
Fax. No. (512) 477-8657  
[chrismalish@fostermalish.com](mailto:chrismalish@fostermalish.com)  
[steventepera@fostermalish.com](mailto:steventepera@fostermalish.com)  
Counsel for dPi

DPI-Teleconnect, LLC  
2997 LBJ Freeway, Suite 225  
Dallas, TX 75234-7627  
Tel. No. (972) 488-5500 x4001  
Fax No (972) 488-8636  
[ddorwart@dpiteleconnect.com](mailto:ddorwart@dpiteleconnect.com)

  
J. Phillip Carver

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint by dPi Teleconnect, L.L.C. ) Docket No.: 050863-TP  
Against BellSouth Telecommunications, Inc. )  
For dispute arising under interconnection )  
Agreement ) Filed August 30, 2007  
\_\_\_\_\_ )

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

COMES NOW, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), and pursuant to Rule 25-22.006, Florida Administrative Code, and Sections 364.183 and 364.24, files its Request for Specified Confidential Classification.

1. On August 9, 2007, AT&T Florida filed its Responses and Objections to dPi's First Request for Information. AT&T Florida's response to Request Nos. 1-3, 1-16, and 1-17 contains customer specific information for dPi Teleconnect, Inc. that is confidential business information. AT&T's response to Request No. 1-22 contains AT&T information that is confidential business information. AT&T Florida filed a Notice of Intent to Request Specified Confidential Classification regarding these proprietary materials on the same day that it responded to the above-described discovery.

2. AT&T Florida hereby files this Request for Specified Confidential Classification because the above-referenced information is confidential business information that could cause competitive harm to dPi and/or AT&T Florida, and is confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24.

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 as confidential.

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

5. Attachment C to AT&T Florida's Request for Confidential Classification is a proprietary copy of the confidential information, highlighted to clearly indicate the proprietary material.

6. Public disclosure of this information would provide competitors of AT&T Florida and dPi with an unfair marketing advantage. Such proprietary information is not available to the general public. The information discussed in this Request for Specified Confidential Classification is valuable and both AT&T Florida and dPi strive to keep it secret. Therefore, such information should be classified as confidential business information and customer proprietary information pursuant to Section 364.24 and Section 364.183(3)(e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

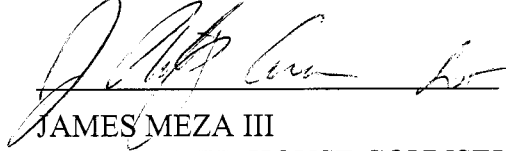
6. AT&T Florida has treated, and intends to continue to treat, the information for which confidential classification is sought as private, and this information has not been generally disclosed.

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

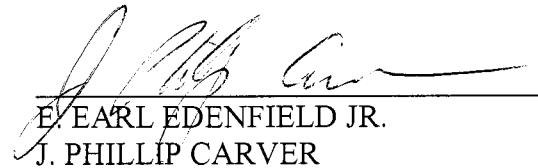
WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 30<sup>th</sup> day of August 2007.

AT&T FLORIDA



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AUTHORIZED HOUSE COUNSEL NO. 464260  
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c/o Gregory R. Follensbee  
150 So. Monroe Street, Suite 400  
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(305) 347-5558



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J. PHILLIP CARVER  
AT&T Southeast  
Suite 4300, AT&T Midtown Center  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0710

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**ATTACHMENT A**

**AT&T FLORIDA  
FPSC DOCKET NO: 050863-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 3  
8/30/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO DPI'S FIRST REQUEST FOR INFORMATION, NOS. 1-3, 1-16,  
1-17 AND 1-22, FILED AUGUST 9, 2007 IN  
FLORIDA DOCKET NO. 050863-TL**

**Explanation of Proprietary Information**

1. The proprietary material included in this document is customer specific information. In particular, the proprietary information details by account, by month, the billing activity of one of AT&T's customers. Such information is deemed by AT&T Florida and by AT&T Florida's customer, dPi Teleconnect, L.L.C. to be competitively sensitive and proprietary information. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and prevent a competitor of the customer from obtaining an unfair advantage. 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.
2. The proprietary material included in this document is end user customer specific information. In particular, the proprietary information consists of phone numbers and/or addresses of dPi's end users. Such information is deemed by AT&T Florida to be proprietary information of AT&T Florida's customer, dPi Teleconnect, and it is also customer information that is proprietary to dPi. The Commission has always zealously protected customer specific information in order to protect the customer's privacy and to prevent a competitor of the customer from obtaining an unfair advantage. This information is also expressly deemed to be confidential pursuant to Sections 364.183(3)(e) and 364.24, Florida Statutes.
3. The proprietary material included in this document consists of email and P-3 forms that document AT&T Florida's market planning processes and provide product analysis used to develop and roll out a retail promotion. 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, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a), Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

AT&T FLORIDA  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO DPI'S FIRST REQUEST FOR INFORMATION, NOS. 1-3, 1-16,  
1-17 AND 1-22, FILED AUGUST 9, 2007 IN  
FLORIDA DOCKET NO. 050863-TL

**RFI 1-3**

<u>Location</u>	<u>Reason</u>
BTN Column, pgs 1-2	1

**RFI 1-16**

<u>Location</u>	<u>Reason</u>
Page 000002, lines 1-8	2
Page 000003, lines 1-6	2
Page 000004, lines 1-2	2
Page 000005, lines 1-5	2
Page 000006, lines 1-4	2
Page 000007, lines 1-4	2
Page 000008, lines 1-5	2
Page 000009, lines 1-7	2
Page 000010, lines 1-7	2
Page 000011, lines 1-8	2
Page 000012, lines 1-3	2
Page 000013, lines 1-9	2

ATTACHMENT A

AT&T FLORIDA  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION  
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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO DPI'S FIRST REQUEST FOR INFORMATION, NOS. 1-3, 1-16,  
1-17 AND 1-22, FILED AUGUST 9, 2007 IN  
FLORIDA DOCKET NO. 050863-TL

**RFI 1-17**

Location

Reason

Entire CD

2

**RFI 1-22**

Location

Reason

Entire Document

3



**ATTACHMENT B**

**AT&T FLORIDA  
FPSC DOCKET NO: 050863-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 1  
8/30/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO DPI'S FIRST REQUEST FOR INFORMATION, NOS. 1-3, 1-16,  
1-17 AND 1-22, FILED AUGUST 9, 2007 IN  
FLORIDA DOCKET NO. 050863-TL**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**AT&T FLORIDA  
FPSC DOCKET NO: 050863-TL  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 1  
8/30/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S  
RESPONSE TO DPI'S FIRST REQUEST FOR INFORMATION, NOS. 1-3, 1-16,  
1-17 AND 1-22, FILED AUGUST 9, 2007 IN  
FLORIDA DOCKET NO. 050863-TL**

**ONE HIGHLIGHTED COPY**

STATE OF FLORIDA

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



OFFICE OF COMMISSION CLERK  
ANN COLE  
COMMISSION CLERK  
(850) 413-6770

**CONFIDENTIAL**

**Public Service Commission**

**ACKNOWLEDGEMENT**

DATE: 8/30/07

TO: M. Gurdian/AT&T

FROM: Ruth Nettles, Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 050863 or, if filed in an undocketed matter, concerning Responses to dPI's request for information, Nos. 1-3, 1-16, 1-17, and 1-22, and filed on behalf of AT &T. *on CD and hard copy.* The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER - DATE  
07864 AUG 30 2007  
PSC COMMISSION CLERK

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