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September 18, 2007

RECEIVED-FPSC  
 07 SEP 18 PM 4: 18  
 COMMISSION  
 CLERK

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

**Re: Docket No. 070126-TL: Petition of AT&T Florida for Relief from  
 Carrier-of-Last-Resort Obligations Pursuant to Florida Statutes  
 § 364.025(6)(d) (Avalon)**

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's *Amended* Request for Specified Confidential Classification for its response to Staff's First Request for Production of Documents, Item No. 5, which we ask that you file in the captioned docket.

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

- CMP
- COM
- CTR
- ECR
- GCL 3
- OPC
- RCA cc: All parties of record
- SCR Jerry Hendrix
- SGA E. Earl Edenfield, Jr.
- SEC James Meza III
- OTH 1 copy records

Sincerely,

Manuel A. Gurdian

This confidentiality request was filed by or for a "telco" for DN 08515-07. 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. portions of DNS 06937-07 & 07822-07)

DOCUMENT NUMBER-DATE

08514 SEP 18 07

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 070126-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 18<sup>th</sup> day of September, 2007 to the following:

Patrick Wiggins (\*)  
Rick Mann (\*)  
Adam Teitzman (\*)  
Theresa Tan (\*)  
Staff Counsel  
Florida Public Service  
Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
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**Avalon Development, LLC**  
Attn: Stokes & Griffith Properties, LLC  
Registered Agent  
John C. Kunkel  
4315 Pablo Oaks Court  
Suite 1  
Jacksonville, FL 32224-9667

**Stokes & Griffith Properties, LLC**  
Attn: Chester E. Stokes, Jr.  
Registered Agent  
Chester E. Stokes, Jr.  
4315 Pablo Oaks Court  
Suite 1  
Jacksonville, FL 32224-9667

**Richmond American Homes of FL, LP**  
Attn: RAH of Florida, Inc.  
4350 South Monaco Street  
Suite 500  
Denver, Colorado 80237

Registered Agent  
Richmond American Homes of FL, LP  
c/o CT Corporation System  
1200 South Pine Island Road  
Plantation, Florida 33324

**Lindhorst Construction, Inc.**  
Attn: Dale A. Lindhorst  
5119 Commercial Way  
Spring Hill, Florida 34606

Registered Agent  
Dale Lindhorst  
4393 Mallard Lake Drive  
Brooksville, FL 34609

**Lexington Homes, Inc.**  
Attn: Craig S. Gallagher  
6115 Guilford Drive  
New Port Richey, FL 34655

Registered Agent  
Craig J. Fiebe  
5623 US Highway 19  
Suite 201  
New Port Richey, FL 34652

**William Ryan Homes Florida, Inc.**  
Attn: Martin M. Ryan  
3925 Coconut Palm Avenue  
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Registered Agent  
William Ryan Homes Florida, Inc.  
c/o CT Corporation System  
1200 South Pine Island Road  
Plantation, FL 33324

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Mallory Gayle Holm  
Vice President  
Avalon Development, LLC  
4315 Pablo Oaks Court  
Jacksonville, FL 32224



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Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of AT&T Florida for Relief from Carrier-of-Last-Resort Obligations Pursuant To Florida Statutes §364.025(6)(d) (Avalon) )  
Docket No: 070126-TL  
Filed: September 18, 2007

**AT&T FLORIDA'S  
AMENDED 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, and Section 364.183, Florida Statutes, files its *Amended* Request for Specified Confidential Classification ("Request").

1. On August 8, 2007, AT&T Florida filed its Responses to Staff's First Set of Interrogatories and First Request for Production of Documents. AT&T Florida's Responses to Request for Production Nos. 1 and 5 contained information to be considered confidential business information. A Notice of Intent to Request Specified Confidential Classification was also filed that same day.

2. On August 29, 2007, AT&T Florida filed its Request for Specified Confidential Classification for AT&T Florida's Responses to Request for Production Nos. 1 and 5.

3. Today, AT&T Florida is filing an *Amended* Request for AT&T Florida's Responses to Request for Production Item No. 5.

4. Pursuant to Rule 25-22.006, AT&T Florida hereby files this *Amended* Request for Specified Confidential Classification because the above documents contain information considered confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. A more specific description of this information is contained in Attachment A.

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5. Public disclosure of this information would cause competitive harm to AT&T Florida and provide competitors with an unfair advantage. The information discussed in this Request for Specified Confidential Classification is valuable and AT&T Florida strives to keep it secret. 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*.

6. 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.

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

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

9. 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 18<sup>th</sup> day of September, 2007.

AT&T FLORIDA



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JAMES MEZA III  
Authorized House Counsel No. 464260  
TRACY W. HATCH  
MANUEL A. GURDIAN  
c/o Gregory R. Follensbee  
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E. EARL EDENFIELD JR.  
AT&T Southeast  
Suite 4300, AT&T Midtown Center  
675 W. Peachtree St., NE  
Atlanta, GA 30375  
(404) 335-0763

**ATTACHMENT A**

**AT&T FLORIDA  
FPSC DOCKET NO: 070126-TL  
AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 2  
9/18/2007**

**AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T  
FLORIDA'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS, NO. 5, FILED AUGUST 8, 2007 IN  
FLORIDA DOCKET NO. 070126-TL**

**Explanation of Proprietary Information**

1. 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 two private subdivisions 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 the project. 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: 070126-TL  
AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 2 OF 2  
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**AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T  
FLORIDA'S RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS, NO. 5, FILED AUGUST 8, 2007 IN  
FLORIDA DOCKET NO. 070126-TL**

**Request for Documents, Item No. 5**

Location	Reason
Page 1 – Columns: Family, Unit Cost, Qty, PICS Ship, Cost	2
Page 1 – Total Materials and Adjusted Total Cost	2
Pages 2-6, All Quantities and dollar amounts	2
Page 7 – Entire Page	2
Page 9 – Columns: Family, Unit Cost, Qty, PICS Ship, Cost	2
Page 9 – Total Materials and Adjusted Total Cost	2
Pages 10-14, All Quantities and dollar amounts	2
Page 15 – Entire Page	2

**ATTACHMENT B**

**AT&T FLORIDA  
FPSC DOCKET NO: 070126-TL  
*AMENDED* REQUEST FOR CONFIDENTIAL CLASSIFICATION  
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***AMENDED* REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T  
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OF DOCUMENTS, NO. 5, FILED AUGUST 8, 2007 IN  
FLORIDA DOCKET NO. 070126-TL**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

**ATTACHMENT C**

**AT&T FLORIDA  
FPSC DOCKET NO: 070126-TL  
*AMENDED* REQUEST FOR CONFIDENTIAL CLASSIFICATION  
PAGE 1 OF 1  
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***AMENDED* REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T  
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OF DOCUMENTS, NO. 5, FILED AUGUST 8, 2007 IN  
FLORIDA DOCKET NO. 070126-TL**

**ONE HIGHLIGHTED COPY**

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

STATE OF FLORIDA



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

**CONFIDENTIAL**

**Public Service Commission**

**ACKNOWLEDGEMENT**

DATE: 9/18/07

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 070126-TL or, if filed in an undocketed matter, concerning response to staff's 1<sup>st</sup> request for PODs, No. 5, and filed on behalf of AT&T. 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  
08515 SEP 18 2007  
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