

**VCI
Company**

~~070000 OF~~
080065-TX

P.O. Box 98907
Lakewood, WA 98496-8907
Phone: (800) 923-8375
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Via Overnight Delivery

December 4, 2007

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

RECEIVED-FPSC
07 DEC -6 AM 9:55
COMMISSION
CLERK

Re: VCI Company d/b/a Vilaire Communications- Petition for Confidential Treatment of Documents Submitted Pursuant to Audit Control No. 07-250-1-2

Dear Ms. Cole:

Enclosed for filing are an original and seven (7) copies of VCI Company d/b/a Vilaire Communications' ("VCI") petition for confidential treatment of documents submitted in connection with an audit conducted by the Division of Regulatory Compliance and Consumer Assistance ("Division"), Audit Control No. 07-250-1-2 ("Petition"). With this Petition, VCI requests confidential treatment of specific documents pursuant to Section 366.093(3) of the Florida Statutes and Section 25-22.006 of the Commission's rules.

CMP _____ It is VCI's understanding that Division staff has obtained clearance from general counsel such that VCI is not required to submit additional copies of confidential documents or redacted versions of those documents as attachments to this Petition.
COM _____

CTR _____ Please acknowledge receipt of this Petition by date-stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.
ECR _____

GCL Questions regarding this Petition may be directed to me.

OPC _____
RCA _____ Sincerely,

SCR _____ VCI Company
SGA _____
SEC _____ Stacey A. Klinzman
OTH/ Regulatory Attorney
records Telephone: 253.830.0056
Electronic mail: staceyk@vcicompany.com

(Conf DN 10380-07)
Petition will be treated as a claim

DOCUMENT NUMBER-DATE
10733 DEC-6 5
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Confidential Classification) Docket No. 080065-TX
of Certain Documents Submitted in Connection)
with Audit Control No. 07-250-1-2) December 4, 2007

VCI COMPANY D/B/A VILAIRE COMMUNICATIONS' PETITION
FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN DOCUMENTS
SUBMITTED IN CONNECTION WITH AUDIT CONTROL NO. 07-250-1-2

VCI Company d/b/a Vilaire Communications ("Company" or "Petitioner"), pursuant to §366.093, F.S., and Rule 25-22.006(3)(a)(2) and (4), F.A.C., submits this Petition for Confidential Classification ("Petition") of the documents described below, which were provided to the Florida Public Service Commission Staff ("Staff") in connection with Staff's audit of the Company under Audit Control No. 07-250-1-2. The Company provides the following information in support of its Petition:

1. The exact name of Petitioner and the address of its principal office are:

VCI Company (doing business in Florida as Vilaire Communications)
2228 S. 78th Street
Tacoma, Washington 98409-9050

2. The names and addresses of the persons authorized to receive notices and communications with respect to this Petition are:

Stanley J. Johnson, President Stan Efferding, Secretary/Treasurer VCI Company 2228 S 78 th Street Tacoma, Washington 98409-9050 Tel Johnson: (253) 973-2476 Tel Efferding: (206) 419-5948 E-mail: stani@vcicompany.com (Johnson) E-mail: Vilaire@Comcast.net (Efferding)	Stacey A. Klinzman, Regulatory Attorney VCI Company 2228 S. 78 th Street Tacoma, Washington 98409-9050 Tel: (253) 830-0056 E-mail: staceyk@vcicompany.com
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3. Staff's final report for Audit Control No. 07-250-1-2 was issued November 19, 2007. During the course of this audit, Staff was provided documents containing information which the

DOCUMENT NUMBER-DATE

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Company considers to be "proprietary business information" under §366.093 (3), F.S. as well as information falling within the definition of Customer Proprietary Network Information in the Federal Communications Commission's rules¹. As required in 25-22.006(3)(a)(2) F.A.C., the Company requested confidential treatment of these documents upon submission to Staff pursuant to Staff's audit document requests. Because the Company believes that the information constitutes trade secret information, proprietary confidential business information² and customer proprietary network information, the Company seeks to maintain the confidential classification of these documents by this Petition.

4. The specific documents for which the Company initially requested confidential treatment and which Staff also have identified as proprietary and confidential are listed below, together with the Company's justification for continued confidential treatment. The documents for which confidential classification is sought are intended to be and are treated by the Company as private. This information has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body.

¹Pursuant to the United States Code, CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. (47 USCS § 222(h)) Every telecommunications carrier has a duty to protect the confidentiality of proprietary information of, and relating to, other telecommunications carriers, equipment manufacturers, and customers. (47 USCS § 222(a)).

² Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes, but is not limited to: (a) trade secrets, (b) internal auditing controls and reports of internal auditors, (c) security measures, systems or procedures (d) information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods and services on favorable terms; (e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. (§366.093(3) F.S).

Item No.	Description (Staff Identified Item Nos.)	Justification for Confidential Classification
1	CD of Names and other identifiers of Link Up and Lifeline Customers (10-10/1)	This information falls within the FCC's definition of customer proprietary network information, which the Company has a general duty to protect pursuant to federal law and disclosure of this information could cause harm to the Company's customers, who are ratepayers. This information constitutes proprietary confidential business information pursuant to §366.093(3), F.S.
2	CD of Commercial Agreement with BellSouth (10-5/1)	This information constitutes proprietary information of other telecommunications carriers under federal law, which the company has a general duty to protect, constitutes contractual data, the disclosure of which would impair the efforts of the Company to contract for goods and services on favorable terms, is subject to a private agreement that provides that the information will not be released to the public, is information relating to competitive interests and is trade secret information. Such information constitutes proprietary confidential business information and is exempt from disclosure pursuant to §366.093(3)(a),(d) and (e), F.S.
3,4, 5	Advertisement Bills and Audit Prepared Schedules of Advertisement Bills (15, 15-1 through 15-44; 15-47)	The Company's advertisement bills constitute trade secret information the disclosure of which would provide competitors with knowledge of the Company's business operations and expenditures and may be used by competitors to harm the Company's competitiveness in the market. Such information is exempt from disclosure pursuant to § 366.093(3)(a) and (e), F.S.
6	Response to Document Request No. 20 (15-46)	The information in the Company's response to Document Request No. 20 constitutes trade secret information and information relating to the Company's competitiveness. Disclosure of this information could harm the Company's competitive position in the marketplace. Such information is exempt from disclosure pursuant to § 366.093(3)(a) and (e), F.S.

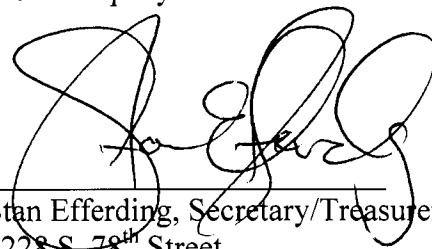
Item No.	Description (Staff Identified Item Nos.)	Justification for Confidential Classification
7	Support for RAF (16-1 through 16-3)	This information constitutes trade secret information and information relating to the Company's competitiveness. This information could be used by competitors to harm the Company's position in the marketplace. Such information is exempt from disclosure pursuant to § 366.093(3)(a) and (e), F.S.
8	FCC Forms 499Q (19 through 19-3)	This information constitutes trade secret information and information relating to the Company's competitiveness. This information could be used by competitors to harm the Company's position in the marketplace. Such information is exempt from disclosure pursuant to § 366.093(3)(a) and (e), F.S.
9	FCC Form 499A (20 through 20-7)	This information constitutes trade secret information and information relating to the Company's competitiveness. The disclosure of this information could be used by competitors to harm the Company's position in the marketplace. Such information is exempt from disclosure pursuant to § 366.093(3)(a) and (e), F.S.
10	Audit prepared schedule from company provided file of duplicate customers of Link-Up for the audit period (22 through 22-6)	This schedule was prepared from the data provided in Item No. 1. This information falls within the FCC's definition of customer proprietary network information, which the Company has a general duty to protect pursuant to federal law. This information constitutes proprietary confidential business information, the disclosure of which could cause harm to the Company's customers, who are ratepayers, under § 366.093(3), F.S.
11	Audit prepared schedule from company provided file of duplicate customers of Link-Up by month (22/1 through 22/149)	This schedule was prepared from the data provided in Item No. 1. This information falls within the FCC's definition of customer proprietary network information, which the Company has a general duty to protect pursuant to federal law. This information constitutes proprietary confidential business information, the disclosure of which could cause harm to the Company's customers, who are ratepayers, under § 366.093(3), F.S.

Item No.	Description (Staff Identified Item Nos.)	Justification for Confidential Classification
12	Customer Bills for Lifeline Customers (23 through 23-66)	This information falls within the FCC's definition of customer proprietary network information, which the Company has a general duty to protect pursuant to federal law and disclosure of this information could harm the company's customers, who are ratepayers. This information also relates to competitive interests of the company, and could provide competitors with information about the company's business plans and strategies to the detriment of the company's position in the marketplace. This information is exempt from disclosure under § 366.093(3)(e), F.S.
13	Customer Bills for Link-Up Customers (23/1 through 23/67)	This information falls within the FCC's definition of customer proprietary network information, which the Company has a general duty to protect pursuant to federal law and disclosure of this information could harm the company's customers, who are ratepayers. This information also relates to competitive interests of the company, and could provide competitors with information about the company's business plans and strategies to the detriment of the company's position in the marketplace. This information is exempt from disclosure under §366.093(3)(e), F.S.
14	TLS Detail (26 through 26-3)	This information constitutes trade secret information and information relating to the Company's competitiveness, business plans and strategies. This information could be used by competitors to harm the Company's position in the marketplace. Such information is exempt from disclosure pursuant to §366.093(3)(a) and (e), F.S.

5. For all of the reasons set forth above, the Company respectfully requests that the Commission grant this request for confidential classification for the information specified within and that the material be treated as confidential pursuant to §366.093, F. S. and Rule 25-22.006, F.A.C.

Dated this 4th day of December, 2007.

VCI Company

A handwritten signature in black ink, appearing to read 'Stan Efferding', is written over a horizontal line. The signature is stylized and somewhat cursive.

Stan Efferding, Secretary/Treasurer
2228 S. 78th Street
Tacoma, Washington 98409-9050
(206) 419-5948
E-mail: Vilaire@comcast.net