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REDACTED

March 19, 2008

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08 MAR 19 PM 4:23
COMMISSION
CLERK

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

Re: FL Docket 000475-TP - Complaint Against Thrifty Call, Inc.
Regarding Practices in Reporting PIU for Compensation
For Jurisdictional Access Services

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for a portion of its Responses to Thrifty Call's Second Request for Production of Documents No. 14.

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

Sincerely,

Manuel A. Gurdian

- CMP 1
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC _____
- OTH 1 comp

cc: All Parties of Record
Jerry D. Hendrix
Gregory R. Follensbee
E. Earl Edenfield, Jr.
Lisa S. Foshee

records

This confidentiality request was filed by or for a "telco" for DN 02065-08. 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.

(See DN 01464-08)

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CERTIFICATE OF SERVICE
Docket No. 000475-TP

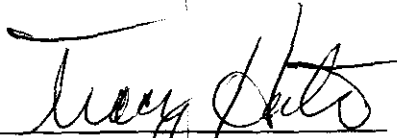
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
Electronic Mail and First Class U.S. Mail this 19th day of March, 2008 to the following:

Charlene Poblete
Rick Mann
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Nancy Pruitt
Sally Simmons
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Florida Public Service Commission
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Martin P. McDonnell, Esq.
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marty@reuphlaw.com



Manuel A. Gurdian

(+) Signed Protective Agreement

FLORIDA PUBLIC SERVICE COMMISSION

In re:

Complaint by BellSouth Telecommunications, Inc.) Docket No. 000475-TP
against Thrifty Call, Inc. regarding practices)
in the reporting of percent interstate usage for)
compensation for jurisdictional access services)
_____) Filed: March 19, 2008

**AT&T FLORIDA'S
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, hereby files its Request for Specified Confidential Classification ("RCC").

1. On February 27, 2008, AT&T Florida filed its Responses to Thrifty Call, Inc.'s ("Thrifty Call") Second Set of Interrogatories (Nos. 7-20) and Second Request for Production of Documents (Nos. 9-16).

2. A Notice of Intent to Request Specified Confidential Classification for its Responses to Thrifty Call's Second Request for Production of Documents Nos. 9, 11, 13 and 14 was filed on that same day.

3. On March 7, 2008, AT&T Florida forwarded correspondence to Thrifty Call's Counsel notifying Thrifty Call of the due date for the RCC and advising that AT&T Florida did not intend to file an RCC to protect Thrifty Call's information provided in response to Thrifty Call's Second Request for Production of Documents Nos. 9 and 13. AT&T Florida further advised Thrifty Call that if it believed that the information was "confidential" that Thrifty Call must file an RCC in order to protect the information from public disclosure. AT&T Florida anticipates that Thrifty Call will file a separate RCC for

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the documents produced in response to Thrifty Call's Second Request for Production of Documents Nos. 9 and 13 if Thrifty Call believes that the documents are "confidential".

4. AT&T Florida hereby withdraws its Notice of Intent to Request Specified Confidential Classification for its Response to Thrifty Call's Second Request for Production of Documents No. 11.

5. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because a portion of its Response to Thrifty Call's Second Request for Production of Documents No. 14 contains 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.

6. 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*.

7. 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.

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

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

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

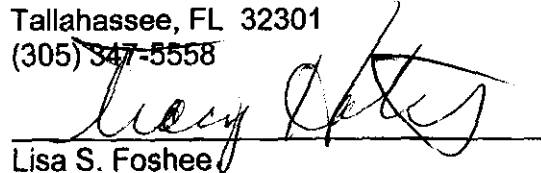
WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 19th day of March, 2008.

AT&T FLORIDA


E. Earl Edenfield, Jr.

Manuel A. Gurdian
c/o Gregory R. Follensbee
150 So. Monroe Street, Suite 400
Tallahassee, FL 32301
(305) ~~347~~-5558


Lisa S. Foshee

John T. Tyler
AT&T Southeast
Suite 4300, AT&T Midtown Center
675 W. Peachtree St., NE
Atlanta, GA 30375

707012

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 000475-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR A PORTION OF
AT&T FLORIDA'S RESPONSE TO THRIFTY CALL'S SECOND REQUEST
FOR PRODUCTION, NO. 14 FILED FEBRUARY 27, 2008 IN
FLORIDA DOCKET NO. 000475-TP**

Explanation of Proprietary Information

1. This information contains confidential business information that is proprietary to AT&T Florida. Specifically, this information contains the summary results of test calls generated between various Florida exchanges. These test results identify the interexchange carriers. This information is not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida and certain IXCs. 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.

POD NO. 14

Location

Reason

Paragraph 1, lines 1-4

1

Carrier/Carrier ID Column

1

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ATTACHMENT B

**AT&T FLORIDA
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR A PORTION OF
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FOR PRODUCTION, NO. 14 FILED FEBRUARY 27, 2008 IN
FLORIDA DOCKET NO. 000475-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

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Inter-LATA/Inter-state
IXC Tests

105600 -

Test calls were generated between Florida points using various interexchange carriers (IXC [REDACTED])

The following is a summary of test call information associated with calls completed via MOI. This information was gathered from the overall tests:

Calls Originated from Miami, FL to Orlando, FL on 11/03/99. The following carriers completed intra-state calls via the MOI trunk group in Orlando:

Originating #	Terminating #	Originating IXC / Carrier ID	MOI Trunk Group
305-826-9900	407-867-2999	[REDACTED]	460
305-826-9900	407-290-5766	[REDACTED]	460
305-826-9900	407-298-1999	[REDACTED]	460
305-826-9900	407-868-0998	[REDACTED]	460
305-826-9900	407-504-9999	[REDACTED]	460
305-826-9900	407-639-0000	[REDACTED]	460
305-826-9900	407-768-1905	[REDACTED]	460
305-826-9900	407-851-5756	[REDACTED]	460

Calls Originated from Cantonment, FL to Orlando, FL on 11/03/99. The following carriers completed intra-state calls via the MOI trunk group in Orlando:

Originating #	Terminating #	Carrier / Carrier ID	MOI Trunk Group
850-968-4902	407-799-1149	[REDACTED]	460
850-968-4902	407-523-9999	[REDACTED]	460
850-968-4902	407-631-0884	[REDACTED]	460
850-968-4902	407-724-1923	[REDACTED]	460
850-968-4902	407-418-1099	[REDACTED]	460
850-968-4902	407-494-1021	[REDACTED]	460

Calls Originated from Orlando, FL to Miami, FL on 10/08/99. The following carriers completed intra-state calls via the MOI trunk group in Miami:

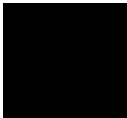
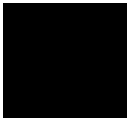
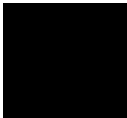
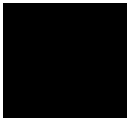
Originating #	Terminating #	Carrier / Carrier ID	MOI Trunk Group
407-649-1702	305-629-9999	[REDACTED]	437
407-649-1702	305-672-5752	[REDACTED]	437
407-649-1702	305-995-9999	[REDACTED]	437
407-649-1702	305-808-9999	[REDACTED]	437
407-649-1702	786-242-9999	[REDACTED]	437
407-649-1702	305-994-9999	[REDACTED]	437

DOCUMENT NUMBER-DATE











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Calls Originated from Orlando, FL to Ft. Lauderdale, FL on 10/08/99. The following carriers completed intra-state calls via the MOI trunk group in Miami:

Originating #	Terminating #	Carrier / Carrier ID	MOI Trunk Group
407-649-1702	954-964-9950		437
407-649-1702	954-724-9950		437
407-649-1702	305-622-9999		437
407-649-1702	954-766-9849		437

Calls Originated from Ft Lauderdale, FL to Orlando, FL on 10/09/99. The following carriers completed intra-state calls via the MOI trunk group in Miami:

Originating #	Terminating #	Originating IXC / Carrier ID	MOI Trunk Group
954-384-3203	407-867-2999		460
954-384-3203	407-636-1992		460
954-384-3203	407-298-1999		460
954-384-3203	407-423-5756		460
954-384-3203	407-854-9999		460
954-384-3203	407-299-9399		460
954-384-3203	407-345-9000		460
954-384-3203	407-617-9999		460
954-384-3203	407-637-9999		460
954-384-3203	407-639-0000		460

Inter-LATA/Inter-state
IXC Tests

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305-826-9900	407-298-1999	[REDACTED]	460
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407-649-1702	786-242-9999	[REDACTED]	437
407-649-1702	305-994-9999	[REDACTED]	437

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954-384-3203	407-345-9000	[REDACTED]	460
954-384-3203	407-617-9999	[REDACTED]	460
954-384-3203	407-637-9999	[REDACTED]	460
954-384-3203	407-639-0000	[REDACTED]	460

ATTACHMENT C

**AT&T FLORIDA
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR A PORTION OF
AT&T FLORIDA'S RESPONSE TO THRIFTY CALL'S SECOND REQUEST
FOR PRODUCTION, NO. 14 FILED FEBRUARY 27, 2008 IN
FLORIDA DOCKET NO. 000475-TP**

ONE HIGHLIGHTED COPY

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
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: March 19, 2008

TO: Manuel A. 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 000475 or, if filed in an undocketed matter, concerning portions of responses to Thrifty's 2nd request for PODs, No. 14, 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
02065 MAR 19 08
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