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January 9, 2009

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

Re: Docket No. 000121A-TP

In Re: Investigation into the establishment of operations support systems permanent incumbent local exchange Telecommunications companies

Dear Ms. Cole:

Enclosed are an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's ("AT&T Florida") Request for Specified Confidential Classification, 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 of the same is being provided to all parties of record.

Sincerely,

Robert A. Culpepper

Enclosures

cc: All parties of record Jerry D. Hendrix

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COM ______
ECR ____
GCL ____
OPC ____
RCP ____
SSC ____
SGA ____
ADM ____
CLK ____

This confidentiality request was filed by or for a "telco" for DNO239-09. 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-r4.11622-08)

DOCUMENT NUMBER-DATE

00238 JAN-98

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE Docket No. 000121A-TP

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

Electronic Mail and U.S. Mail the 9th of January, 2009 to the following:

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(+) Signed Protective Agreement

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)	Docket No.: 000121A-TP
Of Operations Support Systems Permanent)	
Performance Measures for Incumbent)	
Local Exchange Telecommunications.)	Filed: January 9, 2009
Companies (BellSouth Track).	ĺ	3 /

AT&T FLORIDA'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006, Florida Administrative Code, Section 364.183, Florida Statutes, and other applicable law, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") herewith files its Request for Confidential Classification and states as follows.

- 1. In September 2008, the Staff of the Florida Public Service Commission ("Staff") commenced an audit into AT&T Florida's April OSS software release ("April Release"). *See* Commission Order No. PSC-08-0618-PAA-TP, dated September 23, 2008 (accepting the parties' agreement regarding the scope of an April Release audit conducted by Staff). On November 26, 2008, Staff provided AT&T Florida with a draft audit report. On December 16, 2008, and in accordance with applicable law, AT&T Florida requested for the entire draft audit report to be treated as confidential pending the Staff's issuance of a revised audit report. On December 18, 2008, Staff provided AT&T Florida with a report entitled "A Review AT&T's OSS April 208 Release Analysis and Resolutions" ("Audit Report").
- 2. The Audit Report contains proprietary confidential business information. Such information: (i) is treated as proprietary by AT&T Florida; (ii) is not generally disclosed; and (iii) the disclosure of such information could harm the business operations of AT&T Florida. The specific portions of the Audit Report which contain proprietary confidential business

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information, along with the justification offered in support of such classification, are identified in Attachment A to this Request for Confidential Classification.

- 3. Attachment B to this Request for Confidential Classification are redacted versions of the Audit Report wherein the portions of the Audit Report which AT&T considers proprietary confidential business information are blocked out.
- 4. Attachment C to this Request for Confidential Classification is proprietary version of the Audit Report wherein the portions of the Audit Report which AT&T Florida considers proprietary confidential business information are highlighted.

For the reasons set forth herein, AT&T Florida respectfully requests an Order declaring the portions of the Audit Report that AT&T Florida has identified as proprietary confidential business information to be considered and treated as such pursuant to Section 364.183, Florida Statutes and other applicable law.

Respectfully submitted this 9th day of January 2009.

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Attorneys for AT&T Florida

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AT&T Florida FPSC Docket No. 000121A-TP Request for Confidential Classification Page 1 of 3 1/9/09

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

Explanation of Proprietary Information

1. This material is proprietary and confidential business information of a technical nature used by AT&T in conducting its business and is not commonly known by or available to the public. AT&T derives economic value from this information not being generally known to, and not being readily ascertainable by competitors who can obtain economic value from its disclosure. Specifically, this information contains information related to AT&T's Key Learning Review process and/or AT&T's software defect management process. This information is considered proprietary and confidential to AT&T as it describes, among other things, AT&T's internal operations regarding planning, implementing, and managing OSS software releases and the disclosure of such information could cause harm to AT&T. Accordingly, this information is entitled to confidential classification pursuant to Section 364.183(3)(e), Florida Statutes.

AUDIT REPORT – Information highlighted in the following lines:

Location	Reason
Page 2, lines 30 and 32	1
Page 3, lines 20 and 44	1
Page 15, lines 15, 24, and 32	1
Page 16, Exhibit 1 and lines 4 and 7-22	1
Page 17, Exhibit 2 and lines 5-22 and 30-32	1
Page 18, lines 1-13 and 38-40	1

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

Location	Reason
Page 19, lines 21, 24-31, 38-41 and fns. 12 & 13	1
Page 20, lines 1-5, 16-20, 28-37 and fn. 16.	1
Page 21, lines 2-41 and fn. 17	1
Page 22, lines 1-20, 24-41, and fns. 19 & 20	1
Page 23, lines 1-23, 26, and 32-34	1
Page 24, line 23	1
Page 27, lines 20, 21, and 33	1
Page 28, Exhibit 3, lines 14-35, and fns. 22 & 24	1
Page 29, lines 4, 7, 11, 15, 20, 23, 30, and 33	1
Page 30, lines 4-5, and 10-31	1
Page 31, lines 15-18, Exhibit 4, and lines 26-30	1
Page 32 lines 5-8 18-20 Exhibit 5 and lines 33-38	1

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

Location	<u>Reason</u>
Page 33, lines 3-9, 28-32, and 39-46	1
Page 34, lines 7, and 27-28	1
Page 36, lines 14-15 and 18-19	1
Page 37, line 20	1
Page 41, lines 33-34	1
Page 44, lines 39-43	1
Page 47, lines 5-7	1
Page 65, lines 8-42	1
Page 66, lines 1-42	1
Page 67, lines 3-44	1
Page 68, lines 1-45	1
Page 69, lines 1-45	1

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

Location	Reason
Page 70, lines 1-43	1
Page 71, lines 1-40	1
Page 73, lines 4-7, and chart entitled "Selected Pre-Production Defect Management Key Learnings"	1
Page 74, chart entitled "Selected Pre-Production Defect Management Key Learnings"	1
Page 75, chart entitled "Selected Pre-Production Defect Management Key Learnings"	1
Page 77, lines 4-7, chart entitled "Selected Production Defect Management Key Learnings"	1
Page 78, chart entitled "Selected Production Defect Management Key Learnings"	1
Page 79, chart entitled "Selected Production Defect Management Key Learnings"	1
Page 85, lines 37-41, and fn. 44	1
Page 86, line 3	1
Page 97, lines 25-27	1

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

2 COPIES OF PUBLIC DISCLOSURE DOCUMENT

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REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT REGARDING AT&T'S APRIL 2008 OSS RELEASE IN FLORIDA DOCKET NO. 000121A-TP

PROPRIETARY COPY

STATE OF FLORIDA

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



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

Public Service Commission

ACKNOWLEDGEMENT

	DATE: September 9, 2009
TO:	Robert Culpepper, 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 000121A or, if filed in an undocketed matter, concerning A Review AT&T's OSS 4/08 Release Analysis and Resolutions, 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.

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