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April 13, 2009

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


RECEIVED-FPSC  
09 APR 13 PM 4:55  
COMMISSION  
CLERK

**Re: Docket No.: 060476-TL: Petition to Initiate Rulemaking to amend Rules 25-24.630(1) and 25-24.516(1), F.A.C., by BellSouth Telecommunications, Inc.**

Dear Ms. Cole:

Enclosed is AT&T Communications of the Southern States and SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance's Request for Specified Confidential Classification for portions of its response and the attachment to Staff's First Data Request No. 2, which we ask that you file in the captioned docket.

Sincerely,

  
Manuel A. Gurdian

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

- COM \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 2 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCP** \_\_\_\_\_
- SSC \_\_\_\_\_
- SGA \_\_\_\_\_
- ADM \_\_\_\_\_
- CLK 1 \_\_\_\_\_

This confidentiality request was filed by or for a "telco" for DN 03292-09. 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.

DOCUMENT NUMBER-DATE

03292 APR 13 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**Docket No. 060476-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 13th day of April, 2009 to the following Parties of Record and Interested Persons:

Richard Bellak  
Staff Counsel  
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Commission  
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Manuel A. Gurdian

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In the Matter of ) Docket No.: 060476-TL  
Petition to Initiate Rulemaking to amend )  
Rules 25-24.630(1) and 25-24.51(1), )  
F.A.C, by BellSouth Telecommunications, )  
Inc. d/b/a AT&T Florida )  
\_\_\_\_\_ ) Filed: April 13, 2009

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC AND SBC LONG DISTANCE, LLC'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, AT&T Communications of the Southern States, LLC and SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance (hereinafter collectively referred to as "AT&T"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, and files its Request for Specified Confidential Classification.

1. On March 23, 2009, AT&T filed in the above-captioned proceeding, its Responses to the Staff of the Florida Public Service Commission's ("Staff's") First Set of Data Request Item Nos. 1 and 2. The attachment produced in response to part 2 of Item No. 2, and a portion of AT&T's response to part 3 of Item No. 2 contain confidential business information that is considered by AT&T to be proprietary.

2. AT&T hereby files this Request for Specified Confidential Classification because the information contained in above-listed material contains confidential revenue, cost, and sales volume information that are deemed proprietary by AT&T. A more specific description of this information is contained in Attachment A. Public disclosure of this information would cause competitive harm to AT&T and provide competitors with an unfair advantage in the market place.

3. The information discussed in Request for Specified Confidential Classification is valuable and AT&T strives to keep it secret. Therefore, such information should be classified as

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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.

4. Attachment A to AT&T'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.

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

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

7. The information discussed in this Request for Specified Confidential Classification is valuable, AT&T treats this information as confidential in all requests, and this information has not been generally disclosed.

8. 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 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 13<sup>th</sup> day of April, 2009.

AT&T FLORIDA



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E. EARL EDENFIELD JR.

TRACY W. HATCH

MANUEL A. GURDIAN

c/o Gregory R. Follensbee

150 South Monroe Street, Ste. 400

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733207

**ATTACHMENT A**

**AT&T  
Florida Public Service Commission  
Docket No. 060476-TL  
Request for Confidential Classification  
Page 1 of 1  
4/13/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S  
RESPONSES TO STAFF'S FIRST SET OF DATA REQUESTS**

**Explanation of Proprietary Information**

**Item No. 2**

Location of Proprietary Material

- The 2008 revenue number appearing in paragraph 3, page 2 of 2 of AT&T's Response.
- All numbers appearing in column B of the attachment to Item No. 2.

Explanation of Proprietary Material

This information contains competitive, business information, the disclosure of which would impair the competitive business of AT&T. The data is valuable to competitors and potential competitors in formulating strategic plans for entry, pricing, marketing, and overall business strategies concerning these services. This same information on competitors is not available to AT&T. Consequently, such information is a trade secret which should be classified as proprietary, confidential business information pursuant to Sections 364.183(3)(a) and 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

**ATTACHMENT B**

**AT&T  
Florida Public Service Commission  
Docket No. 060476-TL  
Request for Confidential Classification  
4/13/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S  
RESPONSES TO STAFF'S FIRST SET OF DATA REQUESTS**

**TWO REDACTED COPIES FOR PUBLIC DISCLOSURE**

attached confidential and proprietary spreadsheet its costs for overhead (which is all overhead except for building operations, telecommunications costs and staff support) based on 2006 data, the last year for which such data was available. Finally, AT&T Communications of the Southern States, LLC has provided its 2008 Other costs, which include the costs of its call center operations excluding labor costs.

3. SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance does not generate any originating traffic associated with the provision of Operator Services in Florida. SBC Long Distance contracts with other providers to provision operator services and does not actively market 0+ and 0- calls that are subject to Operator Services Caps. SBC Long Distance received minimal operator services revenue from services provided in Florida (approximately in 2008. AT&T is unable to disaggregate this data to the level of detail requested (i.e., for aggregator, payphone, or inmate services).



	A	B	C	D
1	Sales and Expenses 2008 - Florida Specific			
2	Check if: <input checked="" type="checkbox"/> Calendar Year <input type="checkbox"/> Fiscal Year ( _____ to _____ )			
3	<b>AT&amp;T IXC</b>			
4	<b>SALES</b>			
5	0z Payphone Originated Total Sales	\$		Not available
6	0z Hotel/Motel Originated Total Sales	\$		Not available
7	Inmate Originated Total Sales	\$		Not available
8				
9				
10	0z Payphone Uncollectibles	\$		Not available
11	0z Hotel/Motel Uncollectibles	\$		Not available
12	Inmate Uncollectibles	\$		Not available
13				
14				
15	<b>EXPENSES</b>			
16	Labor Attributed to 0z Payphone Originated Sales (Loaded)			
17	Labor Attributed to 0z Hotel/Motel Originated Sales (Loaded)			
18	Labor Attributed to Inmate Originated Sales (Loaded)			
19				
20				
21	G&A Costs Attributed to 0z Payphone Originated Calls			Ex: Marketing, Advertisement, executive pay, etc. (Type over here)
22	G&A Costs Attributed to 0z Hotel/Motel Originated Calls			Do not count costs more than once in each category
23	G&A Costs Attributed to Inmate Originated Calls			
24				
25				
26	Overhead Costs Attributed to 0z Payphone Originated Calls			Building operations expense, telecommunications expense, operations staff support
27	Overhead Costs Attributed to 0z Hotel/Motel Originated Calls			
28	Overhead Costs Attributed to Inmate Originated Calls			
29				
30				Describe Make-up of
31	Other Costs Attributed to 0z Payphone Originated Calls			Ex: Vehicles, supplies, fares, commission, etc. (Type over here)
32	Other Costs Attributed to 0z Hotel/Motel Originated Calls			
33	Other Costs Attributed to Inmate Originated Calls			
34				
35	Total Cost of 0z Calls Originated from Payphones			
36	How many payphones did you provide OSP services in Florida? Not avail			
37	Total Number of 0z Calls Originated from Payphones			
38	Total Number of Minutes Billed			
39	Total Number of Local Calls Billed			
40	Total Number of Person-to-Person Calls			
41				Total call attempts Billable minutes Billable calls Call Attempts
42	Total Costs Hotel/Motel Calls			
43	Total Number of Hotel/Motel Calls			
44	Total Number of Minutes Billed			
45	Total Number of Local Calls Billed			
46	Average Cost Per Hotel/Motel Call			
47				Total call attempts Billable minutes Billable calls
48	Total Costs Inmate Calls			
49	Total Number of Inmate Calls			
50	Total Number of Minutes Billed			
51	Total Number of Local Calls Billed			
52	Average Cost Per Inmate Call			
53				
54	I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."			
55				
56				
57	Title: Lead Financial Analyst, AT&T Customer Information Services			
58	Name (Print): David F. Boone			
59	Signature: _____ Date: _____			
60				

**ATTACHMENT C**

**AT&T  
Florida Public Service Commission  
Docket No. 060476-TL  
Request for Confidential Classification  
4/13/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S  
RESPONSES TO STAFF'S FIRST SET OF DATA REQUESTS**

**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

**Public Service Commission**

**ACKNOWLEDGEMENT**

**DATE: April 13, 2009**

**TO: Manuel A. Gurdian, Esquire/AT&T Florida**

**FROM: Marguerite H. McLean, Office of Commission Clerk**

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

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**This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 060476-TL [DN 03293-09] or, if filed in an undocketed matter, concerning portions of response and attachment to staff's 1st data request, No. 2, and filed on behalf of AT&T Communications of the Southern States, LLC and SBC Long Distance, LLC d/b/a SBC Long Distance d/b/a AT&T Long Distance The document will be maintained in locked storage.**

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