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VIA OVERNIGHT UPS

April 14, 2009

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

090000-0T

RE: RNK Inc. d/b/a RNK Communications, Inc. (Company Code TX942) Request for Confidential Information on RNK's responses to the Data Requests associated with the Commission's 2009 Competitive Local Exchange Carrier (CLEC) Questionnaire

Dear Clerk Cole:

According to the procedures contained in the Commission's rules,¹ RNK requests confidential treatment of some of its responses to the Data Requests associated with the Commission's 2008 CLEC Questionnaire ("Questionnaire.") In particular, RNK submits that responses to Parts II-A (information regarding its local voice grade equivalent channels), II-B (information pertaining to its Voice over Internet Protocol ("VoIP") customers) and V (Zip Codes of its customers) included with its Form 477 filings to the FCC, for the period ending December 31, 2008 be kept confidential. In addition, RNK respectfully requests that its responses on Tables 1 and 5 of the Commission's data sheets for the period ending December 31, 2008 be also kept confidential.

In particular, Part II-A of its FCC Form 477, which was filed under a confidentiality request with the FCC, states the number of Voice Grade Equivalents RNK provides to its customers in Florida, and various other statistics regarding the same, including how they are provisioned and whether RNK is the presubscribed long distance carrier. Part II-B of its FCC Form 477 states the number of its interconnected VoIP customers, the percentage of those customers that are "nomadic," and how many resellers of RNK's VoIP service have end users in the state of Florida. Part V of its FCC Form 477 consists of a list of ZIP codes of RNK's customers. Tables 1 and 5 of the Commission's requests break down RNK's "traditional" and interconnected VoIP service customer base, respectively, by number of customers in each exchange or rate center, as well as by class (business or residential) of customer.

The information that is requested by the Commission is confidential and is treated as such by RNK. This information is not known to the public or to RNK's competitors and is maintained by specifically authorized individuals within the RNK. When it is necessary for RNK to release this information to an third party, it does so only under a strict Non-Disclosure Agreement signed by the receiving party placing them under a contractual duty to maintain confidentiality regarding RNK's competitive information. Furthermore, RNK has requested, and received, similar treatment for similar reports submitted to other State Public Utility Commissions, and to the FCC.

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The Commission requires RNK to divulge information that is competitively sensitive and confidential. It request RNK to provide information that would provide detailed intelligence regarding the location and nature of RNK's customer base. Any one (or part of any one) of these alone would be cause for RNK to demand confidentiality, but in the aggregate it gives competitors a detailed picture of RNK's business

¹ Rule 25-22.006(5), F.A.C.

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plan. Piecing this information together, in conjunction with other, publicly available information will give competitors detailed insight regarding the thrust of RNK's competitive endeavors and, perhaps, use it to their business advantage to undermine or unfairly target RNK's services or prices, or duplicate RNK's business plan, among other actions they might take. Simply stated, maintaining the confidentiality of customer information and network structure is in the public interest and does not deprive the citizens of Florida of any vital information necessary for an informed choice.

Included with this letter is a sealed envelope containing a CD-ROM with the Confidential Responses to the data table requests in Microsoft Excel format as well as an unredacted version of RNK's FCC Form 477, in Adobe .PDF Format. The sealed envelope also contains hard copies of the confidential tables and Form 477, with confidential information highlighted as required by the Commission's rules..

Also are two hard copies of a redacted public version of the Data Tables and the Form 477. The redacted public version will also be filed via email.

If you have any questions, feel free to contact me at (781) 613-6148 or by email at matt@rnkcom.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew T. Kinney", is written over a printed name and title. The signature is fluid and cursive.

Matthew T. Kinney
Manager of Regulatory Compliance

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Public Service Commission

ACKNOWLEDGEMENT

DATE: April 16, 2009

TO: Matthew T. Kinney, Rnk

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 090000 or, if filed in an undocketed matter, concerning (TX942) responses to data request associated with Commission's 2009 CLEC Questionnaire, and filed on behalf of R N K. 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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