



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

10/20 AM 10:11

-M-E-M-O-R-A-N-D-U-M-

CLERK

DATE: October 27, 2010

TO: Charlie Murphy, Senior Attorney, Office of the General Counsel

FROM: *Frank* Frank Trueblood, Regulatory Analyst, Division of Regulatory Analysis

RE: In re: Petition for arbitration of interconnection agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P., Docket No. 100176-TP and In re: Petition for arbitration of interconnection agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners, Docket No. 100177-TP.

On October 11, 2010, AT&T Florida submitted its Responses to Staff's First Request for Production of Documents (Nos 1-37) along with a Notice of Intent to Request Specified Confidential Classification. On October 25, 2010, AT&T submitted a Request for Specified Confidential Classification stating that its response to Item No. 19 of Staff's First Request for Production of Documents contains confidential business information.

AT&T states this information has not been generally disclosed and public disclosure of such would cause competitive harm to AT&T and provide competitors with an unfair advantage in the market place. The information is listed in Attachment C and described as confidential traffic flow and volume data. According to AT&T, the information is proprietary and confidential business information that AT&T seeks to keep confidentially pursuant to Section 364.183(1), Florida Statutes (F.S.) and Rule 25-22.006(5), Florida Administrative Code (F.A.C.)

Based upon my review the information meets the requirements for confidential classification pursuant to Section 364.183, F.S., and should be treated as confidential.

cc: Brenda Merritt, Statistician II, Division of Regulatory Analysis
Kim Pena, Records Management Assistant, Office of Commission Clerk

- COM _____
- APA _____
- ECR _____
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK *Pena*

DOCUMENTAL SERVICES

08969 OCT 20 2010

FPSC - COMMISSION CLERK



Tracy W. Hatch
General Attorney

AT&T Florida
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Suite 400
Tallahassee, FL 32301

T: (850) 577-5508

October 25, 2010

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

Docket No. 100176-TP: Petition for Arbitration of Interconnection Agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P.

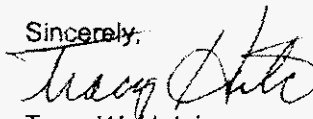
Docket No. 100177-TP: Petition for Arbitration of Interconnection Agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Request for Specified Confidential Classification for its Responses to Staff's First Request for Production of Documents, Item No.19 which we ask that you file in the captioned docket.

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

Sincerely,



Tracy W. Hatch

cc: All parties of record
Gregory R. Follensbee
Jerry D. Hendrix
E. Earl Edenfield, Jr.

Certificate of Service
Docket Nos. 100176-TP and 100177-TP

I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail
this 25th day of October, 2010 to the following:

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Tracy W. Hatch

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Arbitration of)
Interconnection Agreement Between) Docket No. 100176-TP
BellSouth Telecommunications, Inc.)
d/b/a AT&T Florida and. Sprint)
Communications Company L.P.)
_____)

In re: Petition for Arbitration of)
Interconnection Agreement Between) Docket No. 100177-TP
BellSouth Telecommunications, Inc.)
d/b/a AT&T Florida)
and Sprint Spectrum L.P., Nextel South)
Corp., and NPCR, Inc. d/b/a Nextel Partners)
_____) Filed: October 25, 2010

**BELLSOUTH TELECOMMUNICATIONS, INC.'s d/b/a AT&T FLORIDA'S
REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

COMES NOW, BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("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 October 11, 2010, AT&T filed in the above-captioned proceedings, its Responses to the Staff of the Florida Public Service Commission's ("Staff's") First Request for Production of Documents (Nos. 1-37). The document produced in response to Item No. 19, contains 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 traffic flow and volume data 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 the Request for Specified Confidential Classification is valuable and AT&T strives to keep it secret. Therefore, such information

should be classified as confidential business information and customer proprietary 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 and identifies the location of the information designated by AT&T as confidential.

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

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

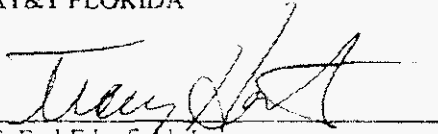
6. The information discussed in this Request for Specified Confidential Classification is valuable, AT&T treats this information as confidential in all requests, and this information has not been generally disclosed.

7. 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 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 25th day of October, 2010.

AT&T FLORIDA



E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

AT&T Florida

c/o Gregory R. Follensbee

150 South Monroe Street

Suite 400

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Tel. No. (305) 347-5558

Fax. No. (305) 577-4491

cc: [illegible]

cc: [illegible]

cc: [illegible]

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ATTACHMENT A

**AT&T Florida
Florida Public Service Commission
Docket Nos. 1000176-TP/100177-TP
Request for Confidential Classification
Page 1 of 1
10/25/10**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S
RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Explanation of Proprietary Information

Item No. 19

Location of Proprietary Material

- All numbers appearing in the charts on Bates numbered page 000163.

Explanation of Proprietary Material

This information contains competitive, business information, the disclosure of which would impair the competitive business of AT&T and possibly that of its customers, Sprint PCS, Nextel, and Sprint CLEC. 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
Florida Public Service Commission
Docket Nos. 1009176-TP/100177-TP
Request for Confidential Classification
Page 1 of 1
10/25/10**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S
RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

Public Disclosure Document

Request for Production No. 19
Attachment

Sprint/Nextel -- CMRS & CLEC Summary				
State	Reciprocal Compensation MOUs		Balance of Traffic	
	Sprint to AT&T	AT&T to Sprint	Sprint	AT&T
FL				

Sprint PCS

State	Reciprocal Compensation MOUs		Balance of Traffic	
	Mobile to Land	Land to Mobile	CMRS	AT&T
FL				

Nextel

State	Reciprocal Compensation MOUs		Balance of Traffic	
	Mobile to Land	Land to Mobile	CMRS	AT&T
FL				

Sprint -- CLEC

State	Reciprocal Compensation MOUs		Balance of Traffic	
	Sprint to AT&T	AT&T to Sprint	Sprint	AT&T
FL				

ATTACHMENT C

**AT&T Florida
Florida Public Service Commission
Docket Nos. 1000176-TP/100177-TP
Request for Confidential Classification
Page 1 of 1
10/25/10**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T'S
RESPONSES TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

ONE HIGHLIGHTED COPY



Tracy W. Hatch
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RAP

2010 OCT 12 AM 10:12

RECEIVED
October 11, 2010

Ms. Ann Cole
Office of the Commission Clerk
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Tallahassee, FL 32399-0850

Docket No. 100176-TP: Petition for Arbitration of Interconnection Agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P.

Docket No. 100177-TP: Petition for Arbitration of Interconnection Agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners

Dear Ms. Cole:

Enclosed is an original and seven copies of BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Notice of Intent to Request Specified Confidential Classification for its Responses to Staff's First Request for Production of Documents, Item No.19 which we ask that you file in the captioned docket.

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

Sincerely,

Tracy W. Hatch

cc: All parties of record
Gregory R. Follensbee
Jerry D. Hendrix
E. Earl Edenfield, Jr.

CLAIM OF CONFIDENTIALITY
 NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
 FILED BY OPC

FOR DN 08500-10, WHICH IS IN LOCKED STORAGE. YOU MUST BE AUTHORIZED TO VIEW THIS DN. - CLK

Certificate of Service
Docket Nos. 100176-TP and 100177-TP

I HEREBY CERTIFY that a true and correct copy was served via Electronic Mail
this 11th day of October, 2010 to the following:

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Tracy W. Hatch

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and Sprint Spectrum L.P., Nextel South)
Corp., and NPCR, Inc. d/b/a Nextel Partners)
_____) Filed: October 11, 2010

**AT&T FLORIDA'S NOTICE OF INTENT AT&T FLORIDA'S NOTICE OF INTENT TO
REQUEST SPECIFIED CONFIDENTIAL CLASSIFICATION**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, files its Notice of Intent.

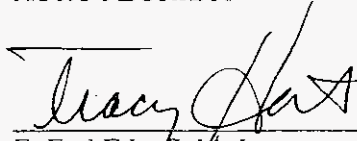
1. On October 11, 2010, AT&T Florida filed its Response to the Staff of the Florida Public Service Commission ("Staff's") First Set of Interrogatories (Nos. 1-69) and First Request for Production of Documents (Nos. 1-37), dated September 15, 2010 in the captioned docket.

2. Staff First Request for Production of Documents No. 19 contains information that is considered confidential business information to AT&T Florida. AT&T Florida is now filing this Notice of Intent pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of this material without delay. The original of this notice has been filed with the Office of the Commission Clerk, and a copy has been served on all parties of record.

FILED IN PUBLIC DATA
8486 OCT 11 2010
FPSC-CLERK/REGISTRATION CLERK

Respectfully submitted this 11th day of October, 2010.

AT&T FLORIDA

A handwritten signature in cursive script, appearing to read "Tracy Hatch", is written over a horizontal line.

E. Earl Edenfield, Jr.

Tracy W. Hatch

Manuel A. Gurdian

AT&T Florida

c/o Gregory R. Follensbee

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