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April 19, 2011

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

RECEIVED-FPSC
11 APR 19 PM 4: 32
COMMISSION
CLERK

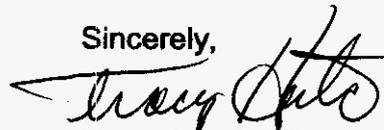
Re: Docket No. 110065-TP: Complaint for relief by Easy Telephone Services Company against BellSouth Telecommunications, Inc. d/b/a AT&T Florida for dispute over interpretation of interconnection agreement regarding cash back promotions

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 the Confidential and Proprietary Exhibits C and D to the Motion to Dismiss and Response to Easy Telephone's Complaint, 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. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,


Manuel A. Gurdian

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 02689-11, which is in locked storage. You must be authorized to view this DN.-CLK

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

COM ___
APA ___
ECR ___
GCL 5
RAD 1
SSC ___
ADM ___
OPC ___
CLK 1



DOCUMENT NUMBER-DATE

02689 APR 19 =

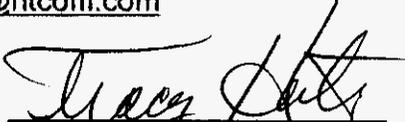
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 110065-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 April, 2011 to the following:

Theresa Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Easy Telephone Services Company
Joseph S. Fernandez
8280 SE 15th Court
Ocala, FL 34480
Tel. No.: (352) 598-7197
jsf@htcoffl.com


Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint for Relief by Easy) Docket No. 110065-TP
Telephone Services Company)
Against BellSouth Telecommunications,)
Inc. d/b/a AT&T Florida for dispute over)
Interpretation of Interconnection Agreement)
Regarding Cash Back Promotions) Filed: April 19, 2011

**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, files its Request for Specified Confidential Classification.

1. On March 29, 2011, AT&T Florida filed its Motion to Dismiss and Response to Easy Telephone Services Company's ("Easy") Complaint in the captioned docket, along with a Notice of Intent to Request Specified Confidential Classification.

2. AT&T Florida hereby files this Request for Specified Confidential Classification because the Confidential and Proprietary Exhibits C and D attached to the Motion to Dismiss and Response to Easy's Complaint contain information that is confidential business information to Easy. A more specific description of this information is contained in Attachment A.

3. The information discussed in the Request for Specified Confidential Classification is confidential to Easy and related to its competitive interests. 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*.

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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 as confidential.

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

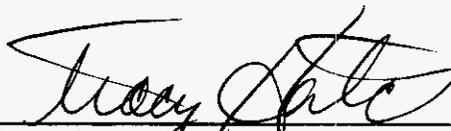
6. Attachment C to AT&T's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

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 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 April, 2011.

AT&T FLORIDA

A handwritten signature in black ink, appearing to read "Tracy Hatch", 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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Tallahassee, FL 32301

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879755

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 110065-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
04/19/2011**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
EXHIBITS C AND D TO THE MOTION TO DISMISS AND RESPONSE TO
EASY TELEPHONE'S COMPLAINT FILED ON MARCH 29, 2011
IN DOCKET NO. 110065-TP**

Explanation of Proprietary Information

1. This information contains confidential business information related to the competitive interests of Easy that is proprietary to Easy. Specifically, this information relates to past due balances owed by Easy to AT&T Florida and number of resale lines that Easy has with AT&T Florida. This information is not publicly available. 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.
2. This information contains confidential business information related to the competitive interests of Easy that is proprietary to Easy. This information is not publicly available. 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

Location

Reason

Page 1, Lines 11, 27-29, 30, 32 and 34	1
Page 2, Lines 1,2, 8, 9 and 14	1
Page 3, Columns A thru G, Lines 1 thru 35	1
Page 4, Columns A thru L, Lines 6 and 9	1
Page 5, Entire page	2

REDACTED

ATTACHMENT B

**AT&T FLORIDA
FPSC DOCKET NO: 110065-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
04/19/2011**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
EXHIBITS C AND D TO THE MOTION TO DISMISS AND RESPONSE TO
EASY TELEPHONE'S COMPLAINT FILED ON MARCH 29, 2011
IN DOCKET NO. 110065-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

DOCUMENT NUMBER-DATE
02689 APR 19 =
FPSC-COMMISSION CLERK

Confidential Exhibit C



REDACTED

AT&T Southeast
600 North 19th Street
22nd Floor
Birmingham, AL 35203

1 VIA FED EX, Tracking Number 8728 8807 7984

2 February 7, 2011

3 Manuel Torrens
4 Easy Telephone Services Company
5 5467 North State Road 7
6 Tamarac, FL 33319

7 Dear Mr. Torrens:

8 **RE: NOTICE OF SUSPENSION AND TERMINATION**

9 AT&T Florida's records indicate that the Florida Resale accounts of Easy Telephone Services Company
10 ("Easy Telephone") has an outstanding **past due balance of** [REDACTED] **as of December 28, 2010.**
11 The Resale accounts are listed on Attachment A.

12 The Interconnection Agreement between AT&T Florida and Easy Telephone covering resale services
13 purchased for the State of Florida, which was approved by the Florida Public Service Commission in
14 Docket No. 060203-TP ("ICA"), requires Easy Telephone to pay AT&T Florida all billed charges,
15 including disputed amounts. See ICA, Attachment 7, Billing, at Section 1.4, which reads, in part:

16 **1.4. Payment Responsibility. Payment of all charges will be the**
17 **responsibility of Easy Telephone Easy Telephone shall make payment**
18 **to BellSouth for all services billed including disputed amounts.**

19 Moreover, Section 1.4.1 of Attachment 7, Billing, to the ICA requires payment for services prior to the
20 next bill date, as follows:

21 **1.4.1. Payment Due. Payment for services provided by BellSouth,**
22 **including disputed charges, is due on or before the next bill date.**

23 Attachment A shows the amounts AT&T Florida billed Easy Telephone for Resale services purchased in
24 the State of Florida, credit adjustments AT&T Florida applied and payments AT&T Florida received from
25 Easy Telephone since May 2008.

26 Significantly, during the period from May 2008 through November 2010, inclusive, AT&T Florida billed
27 Easy Telephone [REDACTED] and applied credit for promotions and other adjustments of [REDACTED]
28 leaving a net amount owed for that period of [REDACTED]. During that same period, however, Easy
29 Telephone paid AT&T Florida only [REDACTED] (less than 10 percent of the net amount owed),¹ while

30 ¹ In mid-December 2010, AT&T inadvertently applied Easy Telephone's security deposit of [REDACTED] as a
31 payment to its account. Within days and within the same billing cycle, AT&T reversed the payment as an
32 adjustment and posted the [REDACTED] as a security deposit. This deposit payment and adjustment are not
33 included in the spreadsheet attached hereto as Attachment A. Easy Telephone thus currently has a security
34 deposit of [REDACTED] with AT&T Florida. Under Section 1.3.1 of Attachment 7, Billing, to the ICA, "[a]ny such



REDACTED

-2-

1 increasing its provisioning of Resale services from AT&T Florida from [REDACTED] lines at the end of
2 January 2009 to [REDACTED] Resale lines provisioned at the end of December 2010 (more than a [REDACTED]
3 increase in Resale lines provisioned from AT&T Florida). Details of the Resale lines provisioned by Easy
4 Telephone are included on Attachment B to this letter.

5 Easy Telephone's past due balance is of significant concern to AT&T Florida given that until July 2010,
6 Easy Telephone was near current on its accounts, and its past due balance has increased substantially
7 since then, as shown in Attachment A. The Resale services Easy Telephone provisioned from AT&T
8 Florida has increased dramatically in that same time period from [REDACTED] at the end of June 2010 to
9 [REDACTED] at the end of December 2010, an increase of more than [REDACTED]

10 Please remit payment to AT&T Florida at the following address:

- 11 AT&T ROC-CABS
- 12 600 North Point Parkway
- 13 Alpharetta, Georgia 30005

14 Should Easy Telephone fail to make payment of [REDACTED] by February 23, 2011, AT&T Florida will take
15 further action pursuant to the ICA, including without limitation Suspension, as provided in Section 1.5
16 et seq. of Attachment 7, Billing, to the ICA.

17 In addition, should Easy Telephone fail to make payment of all past due charges for these Resale
18 services on or before March 15, 2011, including all charges for Resale services that become past due
19 before that date, AT&T Florida will take further action, including without limitation Discontinuance
20 and/or Termination, as provided in Section 1.5, et seq., of Attachment 7, Billing, to the ICA.

21 Should you have any questions, please contact me directly at (205) 244-6716.

22 Sincerely,

- 23 Leisa Mangina
- 24 Manager-Credit & Collections
- 25 AT&T Southeast

26 Attachments (2)

27 security deposit shall in no way release Easy Telephone from its obligation to make complete and timely
28 payments of its bill(s)."

ERA
200...

REDACTED

EASY TELEPHONE SERVICES

ATTACHMENT A

State	A Balance Forward	B Payments	C Adjustments	D Balance Forward minus (Payments + Adjustments) Col B - (Col C + Col D)	E Current Charges	F Late Payment Charges (not included in Col F)	G Amount Due
Florida	(BII account number 308003002, 091003002 and 904003002 with 20th bill date)						
May-08							
June-08							
July-08							
August-08							
September-08							
October-08							
November-08							
December-08							
January-09							
February-09							
March-09							
April-09							
May-09							
June-09							
July-09							
August-09							
September-09							
October-09							
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December-09							
January-10							
February-10							
March-10							
April-10							
May-10							
June-10							
August-10							
September-10							
October-10							
November-10							
*December-10							
Totals	5/08 12/10						
8 Month Totals							

33
34
35
36

*December 2010 payment and adjustment does not reflect the application of Easy Telephone's security deposit as a payment and AT&T's reversal of that payment within days. See footnote 1 of the letter accompanying this chart.

ATTProprietary (Restricted) - Authorized Individuals Only
Customer Proprietary Information

ATTACHMENT B

REDACTED

1 Easy Telephone Services Company

2 State: Florida

3 Resale services purchased in state, as of the year and month specified.

4
5
6

A 2009	B	C	D	E	F	G	H	I	J	K	L
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
[REDACTED]											

7
8

A 2010	B	C	D	E	F	G	H	I	J	K	L
JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
[REDACTED]											

AT&T Proprietary (Restricted) - Authorized Individuals Only

Customer Proprietary Information

Confidential Exhibit D

Exhibit D

Entire Document is Confidential

State of Florida



Public Service Commission

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

**Manuel Gurdian
150 S. Monroe Street
Suite 400
Tallahassee FL 32301**

Re: Acknowledgement of Confidential Filing in Docket No. 110065-TP

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on April 19, 2011, in the above-referenced docket.

Document Number 02690-11 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.