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110000-0T

September 12, 2011

BY HAND DELIVERY

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

- claim of confidentiality
- notice of intent
- request for confidentiality
- filed by CPC

For DN 06SS1-11, which is in locked storage. You must be authorized to view this DN.-CLK

Re: Cox Telcom, LLC - Claim of Confidentiality

Dear Ms. Cole:

Enclosed, pursuant to Rule 25-22.006(5), Florida Administrative Code, please find a "claim" of confidentiality for certain information included in the responses and audit workpapers associated with Audit Control Numbers 11-160-4-1 and 11-160-4-2 of Cox Telcom, LLC. Also included with this claim are one copy of the information with the confidential material highlighted, and two copies with the confidential information redacted.

Thank you for your assistance with this matter. As always, please don't hesitate to contact me if you have any questions whatsoever.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

- COM _____
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Cox Communications
1400 Lake Hearn Dr
Atlanta, Georgia 30319

COMMISSION
CLERK

September 12, 2011

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

Re: Cox Florida Telcom, LLC Request for Confidential Classification
Audit Control Numbers 11-160-4-1 and 11-160-4-2

Dear Ms. Cole:

Cox Florida Telcom, LLC ("Cox") requests confidential treatment of information produced to the Staff in conjunction with the above-referenced Staff audits of Cox's Regulatory Assessment Fee Forms pursuant to Section 364.183, Florida Statutes and Rule 25-22.006, Florida Administrative Code.

By letters dated August 24, 2011 (one letter for each of the above-captioned audits), Staff informed Cox that the audit field work has been completed. Included with each of the letters were copies and a listing of the audit workpapers. Portions of the audit workpapers contain information belonging to Cox that Cox considers proprietary and confidential. Accordingly, pursuant to Section 364.183, Florida Statutes, and Rules 25-22.006(3)(a) and 25-22.006(4), Florida Administrative Code, Cox makes this request that the information identified in the audit workpapers be classified as proprietary and confidential and exempt from public disclosure.

Section 364.183 provides that information which meets certain criteria is exempt from public disclosure under Section 119.07, Florida Statutes. Attachment A to this request contains a specific explanation of the proprietary information and identifies the location of the information designated as proprietary and confidential. Attachment B to this request contains one copy of the audit workpapers with the confidential information highlighted. Attachment C to this request contains two copies of the audit workpapers with the confidential information redacted.

If you have any questions regarding this request, please contact me at 404-269-7364.

Sincerely,

Jennifer Hightower
VP of Regulatory Affairs

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**ATTACHMET A
JUSTIFICATION FOR SPECIFIC REQUESTS FOR CONFIDENTIAL
CLASSIFICATION**

Section 364.183 provides that confidential proprietary business information is any information that is owned or controlled by a company, is intended to be and is treated by the company as private in that the disclosure of the information would cause harm to the ratepayers or the company's business operations, and has not be previously disclosed.

Confidential information includes but is not limited to:

- a) trade secrets
- b) internal auditing controls and reports of internal auditors
- c) security measures, systems, or procedures
- d) information concerning bids or other contractual data, the disclosure of which would impair the competitive business of the provider of information .
- e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information
- f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

Set forth below, pursuant to Rule 25-22.006(4), are the specific descriptions of the information within the audit workpapers for which confidential classification is requested. Except as specifically noted, all of the highlighted information identified below is confidential because it is information revealing Cox's cost and revenue information involved in calculating Regulatory Assessment Fee payments. This information is kept confidential by Cox and is not publicly disclosed by the Company.

The disclosure of this information would allow competitors a window into the internal financial operations of Cox and would harm or impair Cox's competitive business interests. The proprietary confidential business information is identified as follows:

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Page 5p3	Page 12-1p5
Page 5-1p1	Page 12-1p6
Page 5-1p2	Page 12-1p7
Page 5-1p3	Page 41-1, All pages & sections
Page 5-1p4	Page 43, All pages & sections

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