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March 5, 2012

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

RECEIVED-FPSC
12 MAR -5 PM 4:38
COMMISSION
CLERK

Re: Docket No. 110087-TP: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Request for Specified Confidential Classification for portions of its response to Express Phone Service, Inc.'s First Request for Production Nos. 1 and 6, 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,


Suzanne L. Montgomery

cc: All Parties of Record
Gregory R. Follensbee

1020538

COM _____
APA _____
ECR _____
GCL _____
RAD I
SRC _____
ADM _____
OPC _____
CLK I-MM

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

For DN 01297-12, which is in locked storage. You must be authorized to view this DN.-CLK

DOCUMENT NUMBER-DATE

01296 MAR-5 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Notice of the Adoption of existing) Docket No. 110087-TP
interconnection, unbundling, resale, and)
collocation agreement between BellSouth)
Telecommunications, Inc. d/b/a AT& T)
Florida d/b/a AT&T Southeast and Image)
Access, Inc. d/b/a New Phone, Inc. by Express)
Phone Service, Inc.)
_____) Filed: March 5, 2012

**AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL
CLASSIFICATION**

BellSouth Telecommunications, LLC 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 February 13, 2012, AT&T Florida served its Responses to Express Phone Service, Inc.'s ("Express Phone") First Set of Interrogatories (Nos. 1-11) and First Request for Production of Documents (Nos. 1-11), dated January 24, 2012.

2. Portions of AT&T Florida's response to Express Phone's First Request for Production of Documents No. 1 contain information that is considered customer-specific information. A more specific description of this information is contained in Attachment A.

3. Portions of AT&T Florida's response to Express Phone's First Request for Production of Documents No. 6 contain information that is considered carrier proprietary information to Express Phone. A more specific description of this information is contained in Attachment A.

4. The information discussed in the Request for Specified Confidential Classification is confidential to AT&T Florida and Express Phone and relate to its competitive interests. Therefore, such information should be classified as confidential business information

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

5. 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.

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

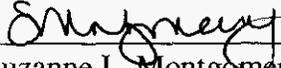
7. Attachment C to AT&T's Request for Confidential Classification is a highlighted copy of the document containing the confidential information.

8. 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 5th day of March, 2012.

AT&T FLORIDA



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CERTIFICATE OF SERVICE
Docket No. 110087-TP

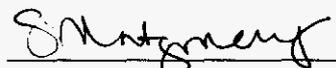
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (*) Federal Express and First Class U.S. Mail this 5th day of March, 2012 to the following:

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

Express Phone Service
Mr. Tom Armstrong (+)(*)
1803 West Fairfield Drive, Unit 1
Pensacola, FL 32501-1040
Tel. No.: (850) 291-6415
Fax No.: (850) 308-1151
tom@dei.gccoxmail.com

Keefe Law Firm
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Atty. for Express Phone

Mark Foster
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Tel. No.: (512) 708-8700
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Atty. for Express Phone


Suzanne L. Montgomery

(+) Signed Protective Agreement
916796

AT&T FLORIDA
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REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
PORTIONS OF AT&T FLORIDA'S RESPONSE TO EXPRESS PHONE'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 1 AND 6
IN DOCKET NO. 110087-TP

Explanation of Proprietary Information

1. The attached information contains AT&T Florida's personal employee information which is unrelated to compensation, duties, qualifications, or responsibilities. AT&T Florida treats this information as confidential information and protects it from disclosure. Therefore, this information constitutes proprietary confidential business information pursuant to Section 364.183(3)(f), Florida Statutes.
2. This information contains confidential business information related to the competitive interests of Express Phone that is proprietary to Express Phone. Specifically, this information relates to past due balances owed by Express Phone to AT&T Florida and number of resale lines that Express Phone 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.

Location

Reason

Response to Request No. 1

Page 1, Lines 1-4	1
Page 3, Lines 2-5	1

Response to Request No. 6

Page 1, Column B, Lines 3-39	2
Page 1, Column C, Lines 3-39	2
Page 1, Column D, Lines 3-39	2
Page 1, Column E, Lines 3-39	2

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

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Page 1, Column F, Lines 3-39	2
Page 1, Column G, Lines 3-39	2
Page 1, Column H, Lines 3-39	2
Page 1, Line 40	2
Page 2, Line 10, Lines 27-30, Line 32, Line 34	2
Page 3, Lines 1 and 2, Line 9	2
Page 4, Column B, Lines 3-34	2
Page 4, Column C, Lines 3-36	2
Page 4, Column D, Lines 3-36	2
Page 4, Column E, Lines 3-34	2
Page 4, Column F, Lines 3-36	2
Page 4, Column G, Lines 3-36	2
Page 4, Column H, Lines 3-34	2
Page 4, Line 37	2
Page 5, Column A, Lines 7 and 10	2
Page 5, Column B, Lines 7 and 10	2
Page 5, Column C, Lines 7 and 10	2
Page 5, Column D, Lines 7 and 10	2
Page 5, Column E, Lines 7 and 10	2
Page 5, Column F, Lines 7 and 10	2
Page 5, Column G, Lines 7 and 10	2
Page 5, Column G, Lines 7 and 10	2
Page 5, Column H, Lines 7 and 10	2
Page 5, Column H, Lines 7 and 10	2
Page 5, Column I, Lines 7 and 10	2
Page 5, Column J, Lines 7 and 10	2
Page 5, Column K, Lines 7 and 10	2
Page 5, Column L, Lines 7 and 10	2
Page 6, Line 11, Lines 38-33	2
Page 6, Line 35	2
Page 6, Line 37	2
Page 7, Line 7	2
Page 8, Column A, Lines 6, 9 and 12	2
Page 8, Column B, Lines 6 and 9	2
Page 8, Column C, Lines 6 and 9	2
Page 8, Column D, Lines 6 and 9	2
Page 8, Column E, Lines 6 and 9	2

ATTACHMENT A

**AT&T FLORIDA
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Page 8, Column F, Lines 6 and 9	2
Page 8, Column G, Lines 6 and 9	2
Page 8, Column G, Lines 6 and 9	2
Page 8, Column H, Lines 6 and 9	2
Page 8, Column H, Lines 6 and 9	2
Page 8, Column I, Lines 6 and 9	2
Page 8, Column J, Lines 6 and 9	2
Page 8, Column K, Lines 6 and 9	2
Page 8, Column L, Lines 6, and 9	2
Page 9, Column B, Lines 3-34	2
Page 9, Column C, Lines 3-36	2
Page 9, Column D, Lines 3-36	2
Page 9, Column D, Lines 3-34	2
Page 9, Column E, Lines 3-34	2
Page 9, Column F, Lines 3-36	2
Page 9, Column G, Lines 3-36	2
Page 9, Column H, Lines 3-33	2

ATTACHMENT B

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
PORTIONS OF AT&T FLORIDA'S RESPONSE TO EXPRESS PHONE'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 1 AND 6
IN DOCKET NO. 110087-TP**

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
03/05/2012**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
PORTIONS OF AT&T FLORIDA'S RESPONSE TO EXPRESS PHONE'S FIRST
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ONE HIGHLIGHTED COPY