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April 13, 2012

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

For DN (2296-12), which

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

<u>Docket No. 110087-TP</u>: 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.

is in locked storage. You must be

authorized to view this DN.-CLK

Dear Ms. Cole:

Re:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Request for Specified Confidential Classification for Exhibit No. TMA-15 attached to Express Phone Service Inc.'s Rebuttal Testimony of Thomas A. Armstrong, 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,

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Tracy W. Hatch

cc: All Parties of Record Gregory R. Follensbee Suzanne L. Montgomery

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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, First Class U.S. Mail and (*) Federal Express this 13th day of April,

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
Itan@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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vkaufman@kagmlaw.com
Atty. for Express Phone

Mark Foster
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Austin, Texas 78701
Tel. No.: (512) 708-8700
Fax. No.: (512) 697-0058
mark@mfosterlaw.com
Atty. for Express Phone

(+) Signed Protective Agreement

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 Expre	ss)	
Phone Service, Inc.)	
	_)	Filed: April 13, 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 March 29, 2012, Express Phone Service, Inc. ("Express Phone") filed the Rebuttal Testimony of Thomas A. Armstrong, along with a Notice of Intent to Request Specified Confidential Classification for Exhibit No. TMA-15.
- 2. Exhibit No. TMA-15 to Thomas A. Armstrong's Rebuttal Testimony contains confidential business information that is considered proprietary to AT&T Florida. 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 AT&T Florida and related to its competitive interests, including its strategy for negotiating resolutions of disputes with its CLEC customers. 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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FPSC-COMMISSION CLERK

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 13th day of April, 2012.

ATETFLORIDA

Suzanne L. Montgomery

Authorized House Counsel No. 94116

Tracy W. Hatch

c/o Gregory R. Follensbee

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ATTACHMENT A

AT&T FLORIDA FPSC DOCKET NO: 110087-TP REQUEST FOR CONFIDENTIAL CLASSIFICATION 04/13/2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR EXHIBIT NO. TMA-15 ATTACHED TO EXPRESS PHONE'S REBUTTAL TESTIMONY OF THOMAS A. ARMSTRONG IN DOCKET NO. 110087-TP

Explanation of Proprietary Information

1. The attached information contains AT&T Florida's strategic information on negotiation of disputes with CLECs concerning security deposits. The disclosure of this information to other CLECs is likely to give them an undue advantage and cause competitive harm to AT&T Florida. 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)(a) and (e), Florida Statutes.

<u>Location</u>	Reason
Page 1, Lines 7 thru 11	1
Page 1, Lines 13 thru 23	1
Page 1. Lines 26 thru 28	1