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From: Dana Greene [DanaG@hgslaw.com]
Sent: Tuesday, June 12, 2012 10:13 AM
To: Filings@psc.state.fl.us
Cc: thatch@att.com; Larry Harris; jlaron@mcsllaw.com; Gary Perko
Subject: RE: Docket 110234-TP - Halo Wireless, Inc.'s Amended First Request for Confidential Classification

Attachments: Docket No. 110234 - Halo's Amended First Request for Confidential Classification.pdf
Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 110234-TP

In re: Bellsouth Telecommunications, LLC d/b/a AT&T Florida v. Halo Wireless, Inc.

c. Document being filed on behalf of Halo Wireless, Inc.

d. There are a total of 6 pages.

e. The document attached for electronic filing is Halo Wireless, Inc.'s Amended First Request for Confidential Classification.

Thank you for your cooperation.

Dana Greene, Legal Assistant to
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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and petition for relief against Halo Wireless, Inc. for breaching the terms of the wireless interconnection agreement, by BellSouth Telecommunications, LLC d/b/a AT&T Florida. | DOCKET NO. 110234-TP
FILED: JUNE 12, 2012

**HALO WIRELESS, INC.'S AMENDED FIRST
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Halo Wireless, Inc., ("Halo" or "Company"), pursuant to Section 364.183, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, submits this Amended First Request for Confidential Classification of information being provided to Staff by Bell South Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida") in response to Staff's First Set of Interrogatories (Nos. 1-5). In support of this request, Halo states:

1. On June 5, 2012, Halo filed its First Request for Confidential Classification regarding certain information provided to Staff by AT&T Florida in response to Staff's First Set of Interrogatories (Nos. 1-5). Halo's First Request for Confidential Classification identified the confidential information and the factual basis for Halo's Request. However, the Request included certain erroneous statutory citations which are correct below.

2. For the reasons discussed below, the information identified in Halo's First Request for Confidential Information includes the following proprietary confidential business information:

(a) In response to Staff Interrogatory No. 2.a and c, AT&T Florida provided sensitive information related to Halo's network equipment locations and underlying transport providers. Public dissemination of this information presents a disclosure of trade secrets, as well as potential network security concerns to Halo and its underlying transport service providers.

See § 364.183(3)(a) and (c), Fla. Stat. The information also relates to the competitive interests

of Halo and underlying transport service provides, the disclosure of which would impair their competitive businesses. *Id.* § 364.183(3)(e). Accordingly, such information constitutes “proprietary confidential business information” which is exempt from disclosure under the Public Records Act pursuant to Section 364.193(1), F.S.

3. The following exhibits were included with Halo’s First Request for Confidential Classification:

(a) Exhibit A is a table which identifies the information for which Halo seeks confidential classification and the specific statutory bases for seeking confidential treatment. (Attached is a revised Exhibit A including corrected statutory citations);

(b) Exhibit B is a package containing two copies of redacted versions of the documents for which Halo requests confidential classification. In the redacted version of the documents, the confidential information has been blackened out by opaque marker or other means.

(c) Exhibit C is a package containing unredacted copies of the documents for which Halo seeks confidential treatment. Exhibit C is being submitted separately in a sealed envelope labeled “CONFIDENTIAL.” In the unredacted versions of the documents, the confidential information has been highlighted in yellow.

4. The information in Exhibit C to Halo’s First Request for Confidential Classification is intended to be and is treated as confidential by Halo. The information has not been disclosed to the public.

5. Halo requests that the information in Exhibit C be classified as “proprietary confidential business information” within the meaning of section 364.183(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section

364.183(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, Halo Wireless, Inc., respectfully requests that this Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 12th day of June, 2012.

//s// Gary V. Perko

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**EXHIBIT "A"
(REVISED)**

JUSTIFICATION FOR CONFIDENTIAL CLASSIFICATION

Document	Bates Nos.	Lines	Description	Statutory Justification
AT&T Florida Response to Staff Interrogatory No. 2.c	Halo-110234-001	1-6	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
AT&T Florida Response to Staff Interrogatory No. 2.a (documents provided to staff by AT&T)	Halo-110234-002	1-19	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-003	1-18	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-004	1-21	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-005	1-26	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-006	1-19	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-007	1-31	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-008	1-38	Information related to the location of Halo's facilities	§366.093(3)(a),(c), (e), F.S.
	Halo-110234-009	1	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-010	1-14	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-011	1-25	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-012	1-20	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-013	1-19	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-014	1-25	Information related to the location of Halo's facilities	§366.093(3)(a),(c), (e), F.S.
	Halo-110234-015	1-18	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-016	1-24	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-017	1-23	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-018	1-31	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-019	1-20	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-020	1-21	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.
	Halo-110234-021	1-38	Information related to the location of Halo's facilities	§366.093(3)(a),(c), (e), F.S.
Halo-110234-022	1	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.	
Halo-110234-023	1-15	Information related to the location of Halo's facilities	§364.183(3)(a),(c) (e), F.S.	

Document	Bates Nos.	Lines	Description	Statutory Justification
	Halo-110234-024	1-17	Information related to the location of Halo's facilities	§364.183(3)(a),(c)(e), F.S.
	Halo-110234-025	1-13	Information related to the location of Halo's facilities	§364.183(3)(a),(c)(e), F.S..

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and U.S. mail, this 12th day of June, 2012, to the following:

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