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Sent: Tuesday, November 13, 2012 2:14 PM
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Cc: Masterton, Susan S; Sherr, Adam
Subject: 090538 QCC Request for Confidential Classification
Attachments: 090538 Request Confidential Classification-Hearing Exhibits 11-13-12.pdf

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Docket No. 090538

Title of filing: CenturyLink QCC's Request for Confidential Classification (Hearing Exhibits)

Filed on behalf of: CenturyLink QCC

No of pages: 18

Description: CenturyLink QCC's Request for Confidential Classification (Hearing Exhibits)

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DOCUMENT NUMBER-DATE
07650 NOV 13 2012
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November 13, 2012

VIA ELECTRONIC FILING

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

Re: Docket No. 090538-TP - Amended Complaint of QWEST COMMUNICATIONS COMPANY, LLC, Against TW TELECOM OF FLORIDA, L.P., BULLSEYE TELECOM, INC., DELTACOM, INC., ERNEST COMMUNICATIONS, INC., FLATEL, INC., NAVIGATOR TELECOMMUNICATIONS, LLC, AND JOHN DOES 1 THROUGH 50, for unlawful discrimination

Dear Ms. Cole:

Enclosed for filing in the above-referenced docket please find Qwest Communications Company, LLC, d/b/a CenturyLink QCC's Request for Confidential Classification (Hearing Exhibits).

Copies are being served upon the parties in this docket pursuant to the attached certificate of service.

Sincerely,

/s/ Susan S. Masterton
Susan S. Masterton

Enclosures

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
DOCKET NO. 090538-TP

I hereby certify that a true and correct copy of the foregoing has been served upon the following by electronic mail delivery and/or U.S. Mail this 13th day of November, 2012.

Florida Public Service Commission Theresa Tan Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 ltan@psc.state.fl.us	Division of Regulatory Analysis Jessica Miller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 JEMiller@psc.state.fl.us
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BullsEye Telecom, Inc. David Bailey 25925 Telegraph Road, Suite 210 Southfield, MI 48033-2527 dbailey@bullseyetelecom.com	Gunster, Yoakley & Stewart, P.A. Matthew J. Feil 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 mfeil@gunster.com
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/s/ Susan S. Masterton
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Amended Complaint of Qwest Communications Company, LLC against MCImetro Access Transmission Services (d/b/a Verizon Access Transmission Services); tw telecom of florida, l.p.; Granite Telecommunications, LLC; Broadwing Communications, LLC.; Budget Prepay, Inc.; Bullseye Telecom, Inc.; DeltaCom, Inc.; Ernest Communications, Inc.; Flatel, Inc.; Navigator Telecommunications, LLC; PaeTec Communications, Inc.; Saturn Telecommunications Services, Inc. d/b/a EarthLink Business; US LEC of Florida, LLC; Windstream Nuvox, Inc.; and John Does 1 through 50, for unlawful discrimination.

DOCKET NO. 090538-TP

FILED: November 13, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION
(HEARING EXHIBITS)

Qwest Communications Company, LLC d/b/a CenturyLink (“QCC”) by and through its undersigned counsel and in accordance with Rule 25-22.006, Florida Administrative Code, hereby requests that the Florida Public Service Commission (“Commission”) enter an order protecting from public disclosure the QCC confidential documents enumerated in Attachment A to this Request. As grounds for this Request, QCC states:

1. The confidential documents consist primarily of certain discovery responses provided by QCC to Florida Public Service Commission staff and other parties and admitted into the hearing record as stipulated exhibits (and related information referenced in certain testimony). The documents were previously subject to Claims of Confidentiality filed by QCC when it responded to the discovery (or by counsel for the party filing the testimony). Attachment A identifies the documents by their Hearing Exhibit number, the date the Claim of Confidentiality was filed and the document numbers assigned to the filing (both to the Claim and the confidential documents). QCC files this Request in accordance with the Prehearing Order (Order No. PSC-12-0553-PHO-TP) and Rule 25-22.006 (8)(b) which require that when documents subject to a claim are entered

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into the hearing record a formal Request for Confidentiality must be filed within 21 days of the hearing for confidentiality to be maintained.

2. The information for which QCC requests confidential classification includes information related to Respondent CLECs or other third parties that was obtained primarily through responses to subpoenas issued to various IXCs by the Commission in this case at QCC's request and provided to QCC under the terms of Non-disclosure Agreements (NDAs). The information also includes information pertaining to QCC's usage and purchase of access services from CLECs and other internal QCC documentation. In addition, some of the information pertains to wholesale agreements QCC has executed with third parties. All of the information is proprietary confidential business information as defined in section 364.183, Florida Statutes. Attachment A contains a list of the specific information for which QCC requests confidential classification, as well as a description of the information and the justification for classifying the information as confidential under section 364.183.

3. Two redacted copies of the confidential information were provided with the Claims for Confidentiality, as required by Rule 25-22.006. In addition, a single copy of the confidential information was filed with the Claims as required by Rule 25-22.006. Further, all of the documents which contain confidential information included a stamp marking them as Confidential (or, in some cases, "Lawyers Only Confidential" for the purposes of the exchange of information among the parties). The information is voluminous and has already been provided to the Commission and the parties with the referenced Claims, in compliance with Rule 25-22.006. Therefore, in the interests of administrative efficiency, QCC is not including additional redacted or confidential copies of the information with this Request. Instead, QCC is providing specific references to the dates and document numbers for the previous filings.

4. Section 364.183(3), F.S., provides:

(3) The term “proprietary confidential business information” means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person’s or company’s business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. The term 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 efforts of the company or its affiliates to contract for goods or services on favorable terms.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

5. The information as described above meets the criteria of section 364.183 in that it includes: 1) in the case of the IXC/CLEC contracts and QCC/third party wholesale contracts, contractual information the disclosure of which would impair QCC’s efforts to contract for goods or services on favorable terms, as described in s. 364.183(3)(d); or 2) in the case of the QCC information, information related to QCC’s competitive interests the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(e). In addition, the information that has been prepared and produced by QCC is trade secret information as described in s. 364.183(3)(a). Further, QCC is bound by the terms of the applicable NDAs to protect the confidentiality of the information provided to QCC under those agreements, both in QCC’s possession and in QCC’s use of the information in this proceeding. Allowing parties to exchange proprietary confidential business information subject to protection under voluntarily executed NDAs facilitates the discovery process.

6. The QCC-produced information is intended to be, and is, treated as confidential by QCC and, to the undersigned counsels' knowledge, has not been otherwise publicly disclosed.

7. For the information that has been designated by the producing IXCs and CLECs as confidential, QCC can confirm that while that information has been in QCC's possession it has been treated as confidential and protected by QCC. However, QCC does not have personal knowledge of, and therefore cannot represent that, such information has been treated as confidential in the possession of the producing parties.

WHEREFORE, QCC respectfully requests that the Commission enter an order protecting the information and documents enumerated and described in Attachment A as proprietary confidential business information that is not subject to public disclosure in accordance with section 364.183, F.S. and Rule 25-22.006, F.A.C.

Respectfully submitted on this 13th day of November, 2012.

/s/ Susan S. Masterton
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ATTORNEYS FOR QWEST COMMUNICATIONS
COMPANY, LLC D/B/A CENTURYLINK QCC

ATTACHMENT A

Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
5	<p>Qwest Communications Company LLC's Objections & Responses To Staff's First Set Of Interrogatories (No. 16) <i>[090538 Hearing Exhibits 00211]</i></p> <p>Highlighted information in QCC's Response to Staff Interrogatory No. 16 on page 22 of QCC's Response</p>	<p>12/15/2011 #08994-11</p>	#08995-11	<p>This exhibit contains information concerning QCC's intrastate access usage which is proprietary confidential business information of QCC. This information is information related to QCC's competitive interests, the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(e).</p>
6	<p>Qwest Communications Company LLC's Objections And Supplemental Response To Staff's First Set Of Interrogatories (No. 19) <i>[090538 Hearing Exhibits 00212]</i></p> <p>Highlighted information in QCC's Supplemental Response to Staff's Interrogatory No. 19 on page 3 of QCC's Supplemental Response</p>	<p>5/11/2012 #03034-12</p>	#03035-12	<p>This exhibit contains information concerning QCC's disputes with CLECs regarding their intrastate access billings to QCC which is proprietary confidential business information of QCC. This information is information related to QCC's competitive interests, the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(e).</p>

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Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
9	<p>Qwest Communications Company LLC's Objections & Responses to Broadwing's Interrogatory (No. 12) <i>[090538 Hearing Exhibits 00285]</i></p> <p>Highlighted information in QCC's Response to Broadwing's Interrogatory No. 12 on page 17 of QCC's Response</p>	<p>3/19/2012 #01654-12</p>	#01655-12	<p>This exhibit contains information relating to a confidential settlement agreement between QCC and AT&T which is proprietary confidential business information of QCC. This information is contractual data the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, as described in s. 364.183(3)(d).</p>
10	<p>Qwest Communications Company LLC's Supplemental Response To Broadwing's Document Request (No. 7) <i>[090538 Hearing Exhibits 00293]</i></p> <p>Entire document – QCC POD 002903 through QCC POD 002906</p>	<p>5/11/2012 #03037-12</p>	#03038-12	<p>This exhibit contains information relating to Broadwing's intrastate access billings to QCC. This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms. In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC. Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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11	<p>Qwest Communications Company LLC's Second Supplemental Response To Broadwing's Document Request (No. 7) <i>[090538 Hearing Exhibits 00302]</i></p> <p>Entire document – QCC POD 002928 through QCC POD 002930</p>	6/4/2012 #03607-12	#03608-12	<p>This exhibit contains information relating to Broadwing's intrastate access billings to QCC. This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d). In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
12	<p>Qwest Communications Company LLC's Supplemental Response To Broadwing Communications LLC's Second Document Request (No. 7) <i>[090538 Hearing Exhibits 00311]</i></p> <p>Entire document, QCC POD 002931 through QCC POD 002940</p>	6/6/2012 #03694-12	#03695-12	<p>This exhibit contains information relating to Broadwing's intrastate access billings to QCC. This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d). In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
17	<p>Qwest Communications Company, LLC's Objections & Response To BullsEye Telecom, Inc.'s Second Set Of Document Requests (Nos. 10-12) <i>[090538 Hearing Exhibits 00390]</i></p> <p>Entire CD- QCC POD 002998 (Exh. DAC-6) QCC POD 002999 (Exh. DAC-5) QCC POD 003000 (BullsEye FL State Analysis) QCC POD 003001 (BullsEye FL Analysis Database)</p>	7/30/2012 #05088-12	#05089-12	<p>This exhibit includes information which represents the same information in Canfield Direct Testimony Exhibits DAC-5 and DAC-6 in Excel format. In addition, this information includes the supporting work papers and other supporting documents for Exhibits DAC-5 and DAC-6. DAC-5 and DAC-6 have already been granted confidential classification pursuant to QCC's Request in Order No. PSC-12-0523-CFO-TP.</p> <p>This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d). In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
18	<p>Qwest Communications Company, LLC's Objections & Responses To BullsEye Interrogatories (Nos. 16 and 19); and document request (No. 18) [090538 Hearing Exhibits 00426]</p> <p>Highlighted information in QCC's Response to BullsEye's Interrogatory No. 16 on page 13 of QCC's Response; entire document provided as an attachment to QCC's Response to BullsEye's Interrogatory No. 19; and entire document in QCC's Response to BullsEye's POD No. 18, QCC POD 003004 – QCC POD 003040</p>	10/1/2012 #06612-12	#06613-12	<p>This exhibit includes: 1) information concerning a confidential settlement agreement between QCC and AT&T which information is contractual data the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, as described in s. 364.183(3)(d); 2) QCC's internal document retention policy; this information is which is proprietary confidential business information and trade secret information of QCC and is information related to QCC's competitive interests, the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(a) and (e); 3) information concerning the terms of QCC's arrangement with TEOCO, which information is contractual data the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, as described in s. 364.183(3)(d).</p>
23	<p>Qwest Supplemental Response to TW Telecom of Florida, L.P.'s Document Request Nos. 3 & 4 [090528 Hearing Exhibits 00515]</p> <p>Entire CD QCC POD001961- QCC POD 002137</p>	2/24/2012 #01075-12	#01076-12	<p>This exhibit includes: 1) QCC's regulatory assessment fee reports filed with the Commission under claims of confidentiality and 2) QCC's responses to the Commission's data requests for its annual report on competition, also filed with the Commission under claims of confidentiality. This information is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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24	<p>Qwest Communications Company, LLC's Objections & Responses To TW Telecom Of Florida, L.P.'s Third Set Of Interrogatories (No. 14), and Fourth Set Of Document Requests (No. 13) <i>[090538 Hearing Exhibit No. 00516]</i></p> <p>Highlighted information in Attachments to QCC's Response to TW Telecom of Florida, L.P.'s Interrogatory No. 14</p> <p>Entire CD QCC POD 003002 (FL Snapshot) QCC POD 003003 (FL Snapshot)</p>	8/2/2012 #05260-12	#05261-12	<p>This exhibit includes: 1) a chart of all of the settlement agreements received from IXCs as a result of the subpoenas issued in this proceeding and provided to QCC in accordance with NDAs and 2) calculations of the amount of overcharges for numerous CLECs based on the information received from the IXCs as well as proprietary confidential business information of QCC. This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d). In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

ATTACHMENT A

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25	<p>Qwest Communications Company, LLC Supplemental Objections and Responses to TW Telecom Of Florida, L.P.'s Third Set Of Interrogatories (No. 14) [090538 Hearing Exhibit No. 00517]</p> <p>Highlighted information in Attachments to QCC's Supplemental Response to TW Telecom of Florida, L.P.'s Interrogatory No. 14</p>	9/21/2012 #06396-12	#06397-12	<p>This exhibit contains information regarding the various settlement agreements QCC received in response to the IXC subpoenas issued in this case and provided to QCC in accordance with NDAs. This information has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d).</p>

ATTACHMENT A

Hearing Exhibit No.	Description and Location of Confidential Information	Date & Document Number of Claim	Confidential Document Number	Specific Justification
26	<p>Qwest Communications Company, LLC's Response TW Telecom Of Florida, L.P.'s Third Set Of Document Requests (Nos. 10-12) <i>[090538 Hearing Exhibit No. 00518]</i></p> <p>Entire CD QCC POD 002960 (Exhibit DAC-25) QCC POD 002961 (Exhibit DAC-26) QCC POD 002962 (TW Telecom State Analysis) QCC POD 002963 (TWT FL Analysis)</p>	7/17/2012 #04764-12	#04765-12	<p>The information contained in this exhibit represents the same information in Canfield Direct Testimony Exhibits DAC-25 and DAC-26 in Excel format. In addition, this information includes the supporting work papers and other supporting documents for Exhibits DAC-25 and DAC-26. DAC-25 and DAC-26 have already been granted confidential classification pursuant to QCC's Request in Order No. PSC-12-0523-CFO-TP.</p> <p>This information is derived from IXC/CLEC agreements provided to QCC in accordance with NDAs between the parties and has been designated as confidential by the producing parties which appears to be contractual data, the disclosure of which would impair the efforts of the contracting parties to contract for goods or services on favorable terms as described in s. 364.183(3)(d). In addition, it includes information concerning QCC's usage and purchase of intrastate access which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the disclosure of which would impair the competitive business interests of QCC as described in s. 364.183(3)(e). Further, the information, as prepared and produced by QCC, is trade secret information, as described in s. 364.183(3)(a).</p>

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28	<p>Qwest Supplemental Discovery Responses to Birch Communications First Set Of Interrogatories (Nos. 1-4) and Document Requests (Nos. 1-3) [090538 Hearing Exhibits 00521-00528]</p> <p>Highlighted information in QCC's Response to Birch's Interrogatory No. 1 on pages 3-5 of QCC's Response and highlighted information in QCC's Response to Birch's Interrogatory No. 4 on pages 6 and 7 of QCC's Response</p>	4/27/2012 #02690-12	#02691-12	<p>This exhibit contains information concerning wholesale service agreements between QCC and CLECs which is proprietary confidential business information of QCC and is contractual data the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, as described in s. 364.183(3)(d). In addition, this exhibit contains information concerning QCC disputes with other CLECs regarding access services provided to QCC which is proprietary confidential business information of QCC and is information related to QCC's competitive interests, the release of which would impair the competitive business of QCC, as described in s. 364.183(3)(e).</p>

ATTACHMENT A

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84	<p>Late-filed stipulated hearing Exhibit 84, which is the confidential material within QCC's objections and supplemental responses to BullsEye's 2nd set of interrogatories (Nos. 10-12 and 17-18) and 3rd set of document requests (Nos. 17 and 22)</p> <p>Highlighted information in QCC's Response to BullsEye Interrogatory No. 10 on page 3 of QCC's Supplemental Response; the entirety of documents produced by QCC in Response to BullsEye's POD #17, QCC POD 003041 through QCC POD 003163</p>	<p>10/22/2012 #07159-12</p> <p>(See Also BullsEye #07352-12 filed on 10/30/12)</p>	<p>#07160-12</p> <p>(See Also BullsEye Document #07353-12)</p>	<p>This exhibit contains information concerning wholesale agreements QCC entered into with wholesale customers which is proprietary confidential business information of QCC and is contractual data the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, as described in s. 364.183(3)(d).</p>

ATTACHMENT A

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N/A	Don Wood Direct Testimony Highlighted information at page 56, line 18 through page 59, line 21 and footnote 23 on page 57	6/14/12 #03883-12	#03884-12	See justification for Hearings Exhibits 28 and 84
71	DJW-2 Qwest Agreement No. 1 <i>[090538 Hearing Exhibit 71]</i> Entire Document-Excerpt Service Exhibit E1 (QCC POD 002660)			
72	DJW-3 Qwest Agreement No. 2 <i>[090538 Hearing Exhibit 72]</i> Entire Document -Excerpt Service Exhibit F1			