

McFarlain & Cassedy, P.A.

Attorneys at Law

March 17, 2004

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> > FROM THE DESK OF: WILLIAM B. GRAHAM e-mail: bgraham@mcfarlain.com

Blanca S. Bayo Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0855

This confidentiality request was filed by or for a "telco" for DNO 3604-04. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

(x-r4.11437-03: 12215-03

Re:

Docket No. 030851-TP: Implementation of Requirements Arising from Federal Communications Commission's Triennial UNE Review: Local Circuits Switching for Mass Market Customers

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of Comcast Phone of Florida, LLC's Request for Confidential Classification in connection with the company's responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing please do not he sitate to contact me.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me.

RECEIVED & FILED

BUREAU OF RECORDS

Very truly yours,

William Graham, Esq.

Attorney for Comcast Phone of Florida, LLC

WBG\ktc

Encl.

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CAF

CMP

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ECR

GCL OPC WMS SEC

cc: All Parties of Record

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requiremen	ts)		•
arising from Federal Communication	13)	Docket No.	030851-TP
Commission triennial UNE review:)		
Local Circuit Switching for Mass)		
Market Customers)		

COMCAST PHONE OF FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Comcast Phone of Florida, LLC, ("Comcast Phone") by and through its undersigned counsel, hereby files its Request for Confidential Classification pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, F.A.C. The information for which Comcast Phone seeks confidential classification is contained in Comcast Phone's Responses to BellSouth Telecommunications, Inc's First Set of Interrogatories. The confidential classification is sought specifically for numbers 1, 2, 3, 7, Confidential Exhibit "A" to Comcast Phone's Response to BellSouth's First Interrogatories dated November 14, 2003, Confidential Exhibit "A" to Comcast Phone's Second Amended Responses to BellSouth's First Interrogatories dated December 2, 2003, and Comcast Phone's Supplemental Response to Interrogatory No. 5 contained in Comcast Phone's Third Amended Response to BellSouth's First Interrogatories dated December 10, 2003.

All of the information contained in the responses to interrogatories described above for which Comcast Phone seeks confidential treatment falls within the bounds of Florida Statute Section 364.183(3), which defines "Proprietary Confidential Business Information" as:

Information, regardless of form or characteristic, which is owned or controlled by the person or company, and 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 rate payers or to the person's or

DOCUMENT NUMBER - DATE

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company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of the Court or an administrative body, or private agreement that provides that the information will not be released to the public.

This statutory definition of "Proprietary Confidential Business Information" specifically includes, ... "information relating to competitive interests, disclosure of which would impair the competitive business of the provider of information." (364.183(3)(e) F.S.

above they may more easily develop business models or strategies to respond to the actions taken by Comeast Phone in the Florida Telecommunications market. This would afford them an unfair advantage in the market place. That unfair advantage would ultimately harm Comeast Phone's business operations in the State of Florida and would in turn result in harm to the Florida rate payers. In light of the foregoing, Comeast Phone respectfully requests that the Florida Public Service Commission classify the documents and information described herein as confidential.

One highlighted copy of the confidential work papers described herein is attached to the original of this request as Exhibit "A". Two redacted copies of that same information are attached as Exhibit "B". Exhibit "C" provides the line-by-line justification for confidential classification required by Rule 25-22-006(4)(c), F.A.C.

Respectfully submitted this _____ day of March, 2004

William B. Graham, Esq.

Fla Bar No. 0359068

McFARLAIN & CASSEDY, P.A.

305 South Gadsden Street

Tallahassee, FL 32301

850/222-2107

850/222-8475 (facsimile)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential

Classification has been provided by U.S. Mail this ______ day of March, 2004, to the following:

Adam Tietzman, Staff Counsel Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0859

Richard Chapkis Verison Florida, Inc. 201 North Franklin Street MC: FLTC0717 Tampa, FL 33602

Donna Canzano McNulty MCI WorldCom 1203 Governors Square Boulevard Suite 201 Tallahassee, FL 32301

Tracy Hatch
AT&T Communications of the
Southern States, LLC
101 N. Monroe Street, Ste. 700
Tallahassee, FL 32301

Matthew Feil Florida Digital Network, Inc. 390 North Orange Avenue, Ste. 2000 Orlando, FL 32801

Floyd R. Self Messer, Caparello & Self 215 S. Monroe Street, Ste. 701 Tallahassee, FL 32301 Susan Masterton
Sprint Communications Company
1313 Blairstone Road
MC: FLTLHOO 107
Tallahassee, FL 32301

Norman H. Horton, Jr. 215 South Monroe Street Tallahassee, FL 32301

Michael Gross Florida Cable Telecommunications 246 East 6th Street Tallahassee, FL 32302

Jeffrey J. Binder Allegiance Telecom, Inc. 1919 M. Street, NW Washington, DC 20037

Nanette Edwards ITC DeltaCom 4092 S. Memorial Parkway Huntsville, AL 35802

Andrew O. Isar Miller Isar, Inc. 2901 Skansie Ave., Ste. 240 Gig Harbor, WA 98335

Jake E. Jennings, Sr. Vice President Regulatory Affairs & Carrier Relations NewSouth Communications Corp. NewSouth Center Two N. Main Center Greenville, SC 29601 Rand Currier Geoff Cook Granite Telecommunications, LLC 234 Copeland Street Quincy, MA 02169-4005

Jon C. Moyle, Jr. Moyle, Flanigan, Katz, et al The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

Lisa A. Sapper AT&T Comm. Of the Southern States, LLC 1200 Peachmeet St., N.Z., Ste. 8100 Atlanta, GA 30309-3579

Allegiance Telecom of Florida, Inc. Theresa P. Larkin/Jeffrey J. Binder 700 East Butterfield Road, Ste. 400 Lombard, IL 60148-5671

Covad Communications Company Mr. Charles E. Watkins 1230 Peachtree Street, NE, 19th Floor Atlanta, GA 30309-3574

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301

KMC Telecom III, LLC Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119

MCI WorldCom Communications De O'Roark, Esq. Six Concourse Parkway, Ste. 600 Atlanta, GA 30328

William B. Graham, Esq.

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RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

1. Please provide the 11-digit COMMON LANGUAGE® Location Identifier (CLLITM) of each switch used to provide qualifying service anywhere in the state of Florida that is owned by your company. If you leads, rent or otherwise obtain switching capacity on switch that you do not own (other than from an incumbent Local Exchange Carrier), provide the same information regarding all such switches.

Response:

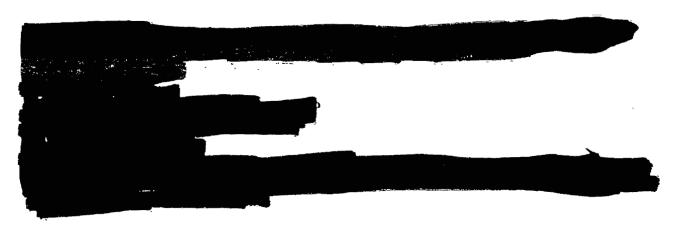
Comcast Phone of Florida, LLC ("Comcast Phone") objects to this Request to the extent that it seeks information outside of the possession or control of Comcast Phone. Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds as follows:

[BEGIN CONFIDENTIAL INFORMATION]



¹ A "qualifying service" is a telecommunications service that competes with a telecommunications service that has been traditionally the exclusive or primary domain of incumbent LECs, including, but not limited to, local exchange service, such as plain old telephone service, and access services, such as digital subscriber line services and high-capacity circuits. 47 C.F.R. § 51.5.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC



[END CONFIDENTIAL INFORMATION]

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

2. For every switch identified in response to Question 1, provide the number of DS-0/voice grade equivalent access lines that switch is equipped to provide. If you lease, rent or otherwise obtain capacity on someone else's switch, provide the DSO/voice grade equivalent access lines associated with the capacity you have obtained.

Response:

Comcast Phone objects to this Request to the extent that it seeks information outside the possession or control of Comcast Phone (i.e., information about the number of DS-0/voice grade equivalent access lines that the switches included in the response to Request No. 1 are equipped to provide). Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds that the number of voice-grade equivalent DS0 lines served by Comcast Phone using the arrangement described in response to Request No. 1 is:

[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triential UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

3. For every switch identified in response to Question 1, provide the number of DS-0/voice grade equivalent access lines currently in use and state the date for which such information is provided.

Response:

Comcast Phone objects to this Request on the ground it is vague and ambiguous with respect to the phrase "in use." Comcast Phone further objects to this Request to the extent that it seeks information outside the possession or control of Comcast Phone (i.e., information about the number of DS-0/voice grade equivalent access lines in use by a variety of parties outside the control of Comcast). Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds that the number of voice-grade equivalent DS0 lines served by Comcast Phone using that arrangement is:

[BEGIN CONFIDENTIAL INFORMATION] [END CONFIDENTIAL INFORMATION]

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

4. State whether each switch identified in response to Question 1 serves residential customers.

Response:

Comcast Phone uses the arrangement described in response to Request No. 1 to serve residential customers in the State of Florida.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

5. Does this switch serve customer locations with:

- a. 1 line only?
- b. 2 or fewer lines?
- c. 3 or fewer lines?
- d. 4 or fewer lines?
- e. 5 or fewer lines?
- f. 6 or fewer lines?
- g. 7 or fewer lines?
- h. 8 or fewer lines?
- i. 9 or fewer lines?
- j. 10 or fewer lines?

Response:

Comcast Phone objects to this request on the grounds that it is unduly burdensome. In particular, the request for information by number of lines is unduly burdensome because Comcast Phone does not maintain information in that format. In order to provide such information in that format, the company would be forced to undertake a special study which would be burdensome and outside the ordinary course of the company's business. Subject to those objections and without waiver thereof, please refer to the line numbers supplied in response to Request Nos. 2 and 3.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

6. For each grouping of customer locations identified in Question 5 (locations with 1 line, locations with 2 or fewer lines, etc.), provide:

- a. The individual customer locations. Initially, it will be sufficient to provide these locations by wire center service area. If that information is not readily available, then the information should be provided by actual customer address. To explain further, this question asks you to provide, initially by wire center service area, the number of customer locations you serve that have one line, two lines or fewer, three lines or fewer, etc. If you cannot provide the information by wire center service area, then provide this information by actual customer location, i.e. Customer A is located at 1234 Broadway, Miami, Florida, and has one line, and so forth.
- b. The number of lines at each location that are used to provide voice service, and the number of lines that are used to provide data service, identified separately. If each line is used to provide both voice and data, so indicate.

If you know that the specific customer location is served by lines provided by another CLEC, or by an ILEC, provide the number of DS0/voice grade equivalent lines provided at each customer location by other CLECs or ILECs.

Response

Comcast Phone objects to this Request on the grounds that it is overbroad, unduly burdensome and oppressive. In particular, the request is unduly burdensome and oppressive because Comcast Phone does not maintain information by number of lines or by wire center. In order to provide the information in the requested format, Comcast Phone would be forced to undertake a special study which would be burdensome and outside the ordinary course of the company's business. Further, Comcast Phone objects to the request of information by "actual customer location," inasmuch as that request is unduly burdensome and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Subject to those objections and without waiver thereof, please refer to the line numbers supplied in response to Request Nos. 2 and 3.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

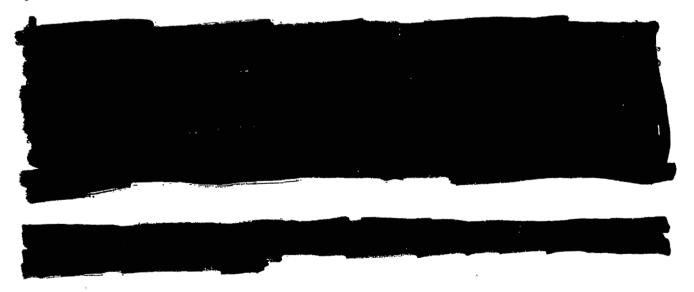
David Sered, Director of Regulatory Affairs

7. Provide the street address (e.g., 123 Main Street), the city (e.g., Miami), and the state (e.g., FL) where every switch identified in response to Question 1 is located.

Response:

Comcast Comcast Phone objects to this Request to the extent that it seeks information outside of the possession or control of Comcast Phone. Comcast Phone further objects to this Request on the grounds that, to the extent Comcast Phone possesses such information, if any, production of that information would require Comcast Phone to violate confidentiality agreements. Subject to those objections and without waiver thereof, Comcast Phone responds as follows:

|BEGIN CONFIDENTIAL INFORMATION|



FND CONFIDENTIAL INFORMATION

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

November 7, 2003

Respondent:

David Sered, Director of Regulatory Affairs

8. Do you offer to provide or do you provide switching to other carriers for their use in serving customers? If yes, state: (a) the carriers to whom you provide switching; (b) the types of service, if known, that are previded by the carriers to whom you provide switching; (c) whether you will provide switching to any requesting carrier; (d) identify each wire center district (by eight digit CLLI code) in which wholesale switching is available.

Response

No. Comcast Phone does not offer switching to other carriers for their use in serving customers. Therefore, subparts (a) through (d) are inapplicable to Comcast Phone.

RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

Docket No. 030851-TP

DATE:

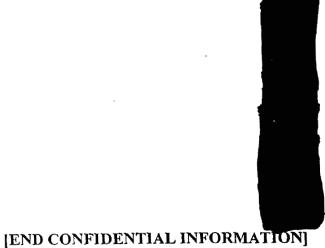
November 7, 2003

CONFIDENTIAL EXHIBIT A

The number of voice-grade DS0 lines by which the company provides voice services to end users, as of the date of this response, is listed below by rate center:

[BEGIN CONFIDENTIAL INFORMATION]





[END CONFIDENTIAL INFORMATION]

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising from Federal Communications Commission triennial UNE review: Local Circuit Switching for Mass Market Customers) Docket No. 030851-TP))
	AFFIDAVIT
BEFORE ME, the undersigned a	authority, personally appeared David Sered, who
deposed and state that he/she provided	the answers to Interrogatories BellSouth
Tolecommunications, hie. served on ec	meast Phone of Florida, LLC d/b/a Comcast
Digital Phone on October 31, 2003 and	that the responses are true and correct to the best
of her/her personal knowledge, informa	ation and belief.
FURTHER AFFIANT SAYETI	NOT. SIGNATURE OF AFFIANT
DATED, this 1/2 that day of	November, 2003.
Sworn to and subscribed before NOTARY PUBLIC My Commission Expires: LINDAL DAVIDSON	me this day of November, 2003.

INTERROGATORIES OF BELLSOUTH TELECOMMUNICATIONS, INC. RESPONSES OF COMCAST PHONE OF FLORIDA, LLC

Re: In re: Implementation of requirements arising From Federal Communications Commission ... triennial UNE review: Local Circuit Switching for Mass Market Customers.

Docket Nos.

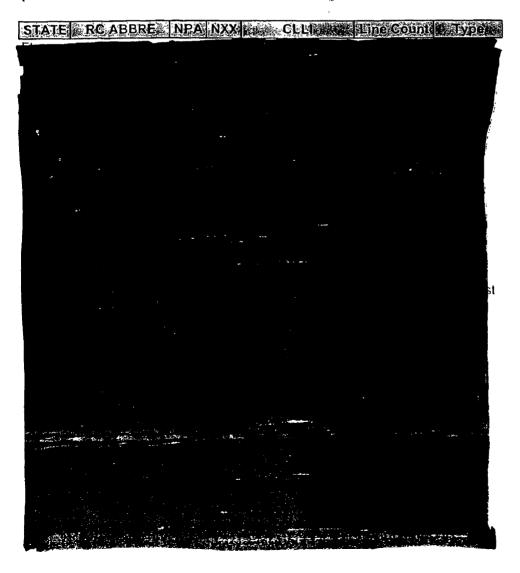
Docket No. 030851-TP

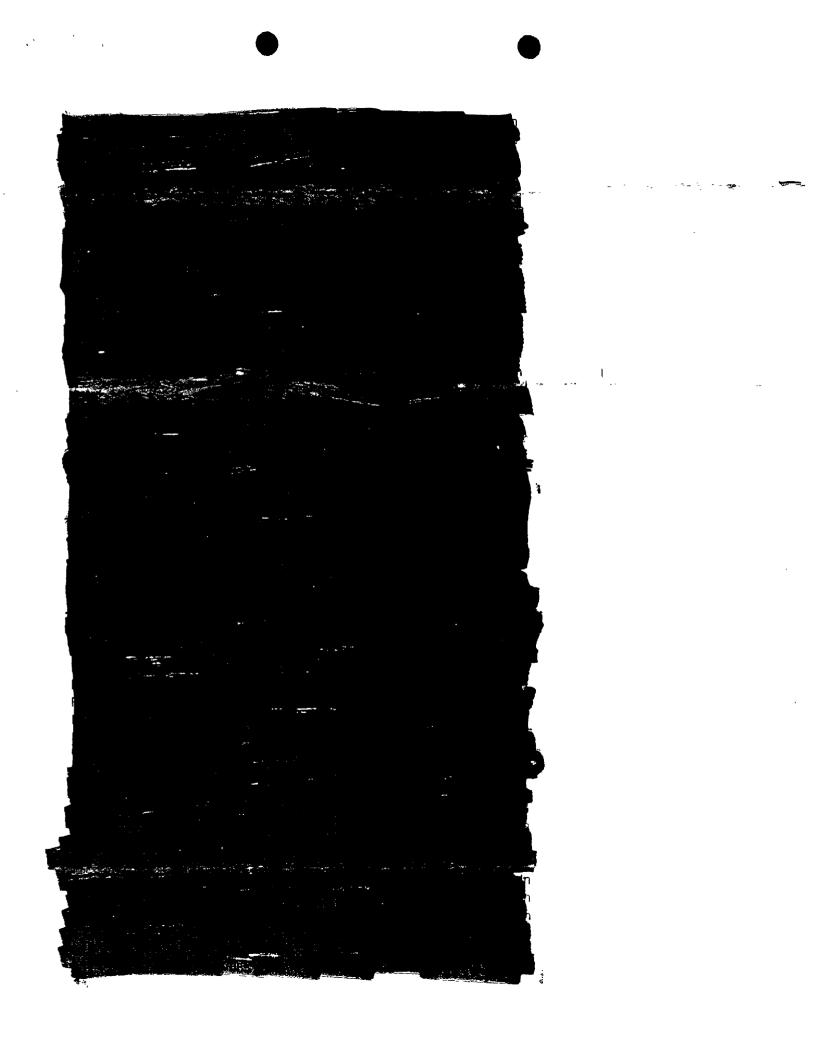
DATE: 25-Nov-03

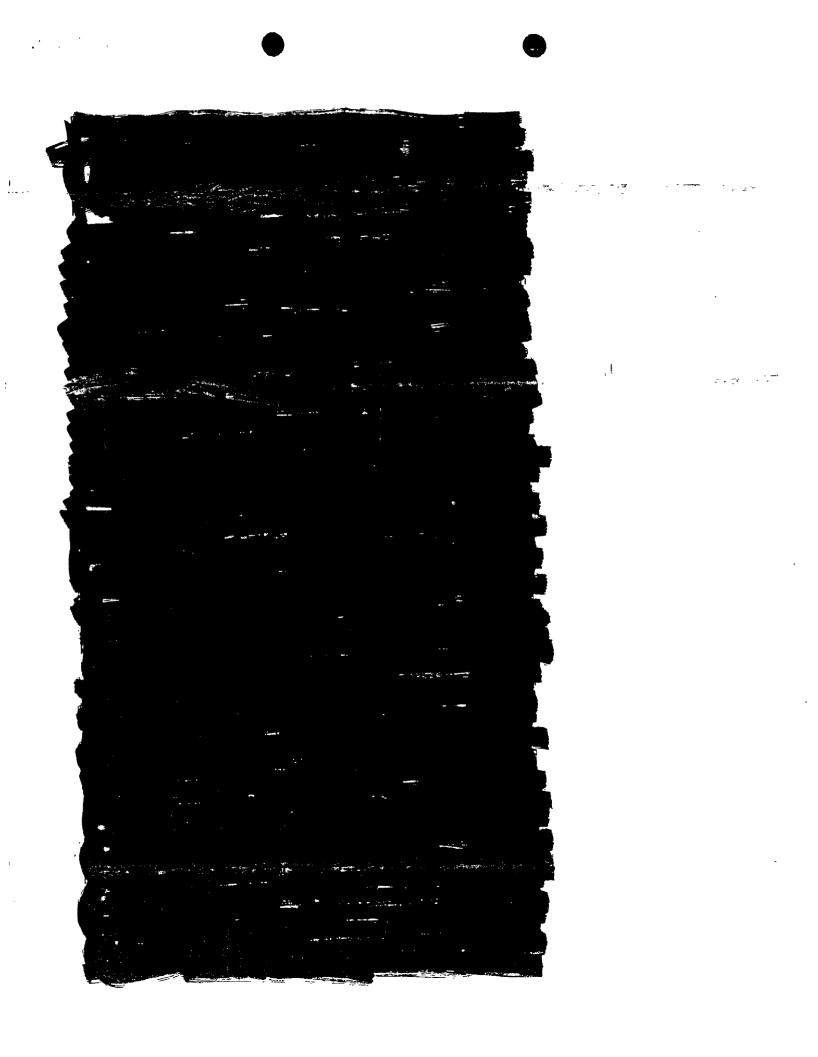
CONFIDENTIAL EXHIBIT A

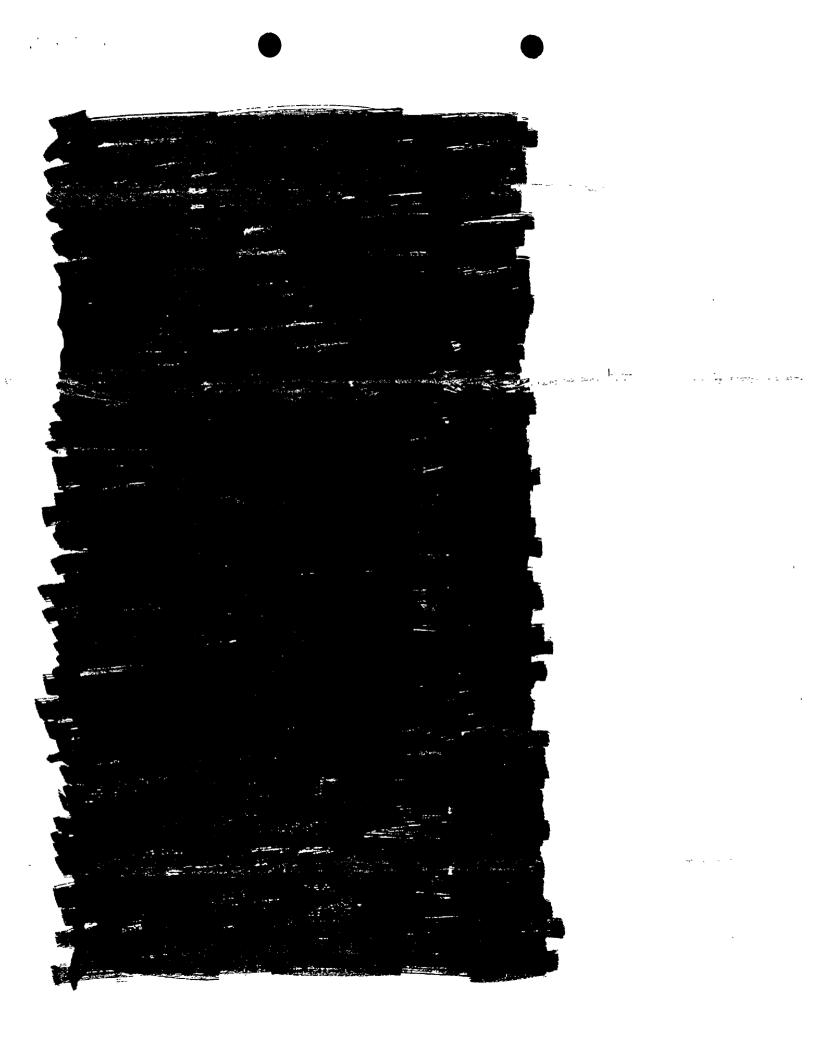
The number of voice-grade DS0 lines by which the company provides voice services triennial to end users, as of the date of this response, is listed below by NPA/NIXX.

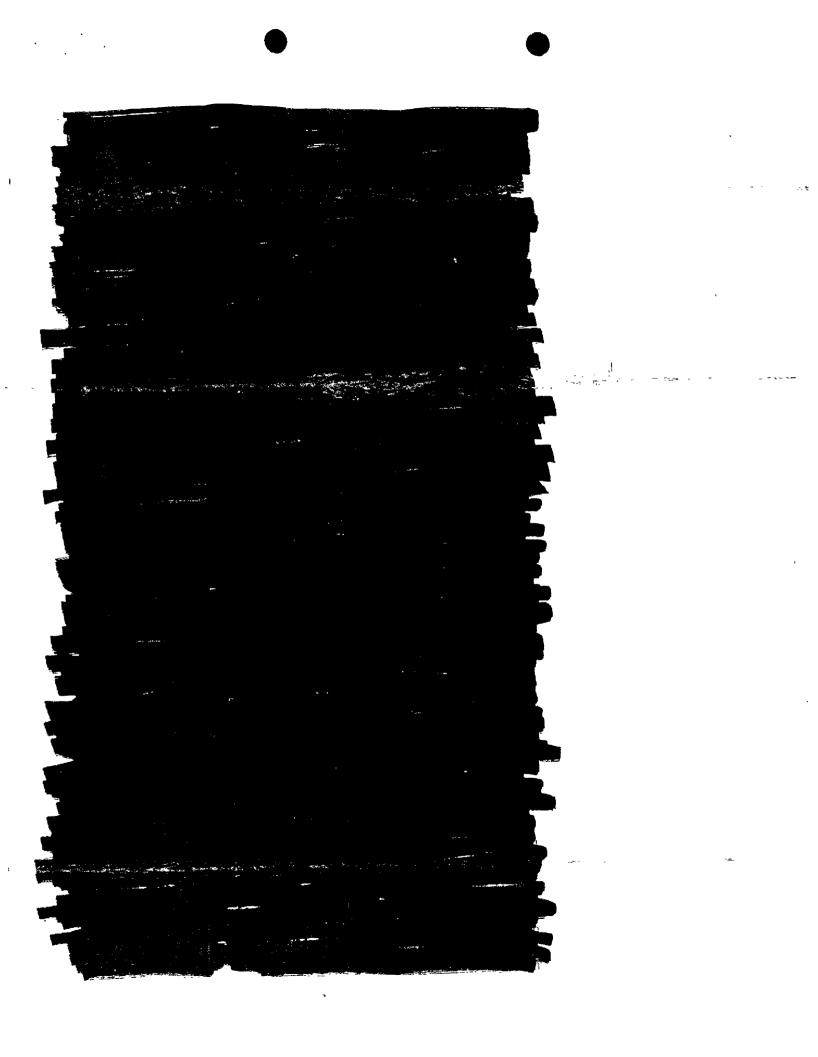
[BEGIN CONFIDENTIAL INFORMATION]

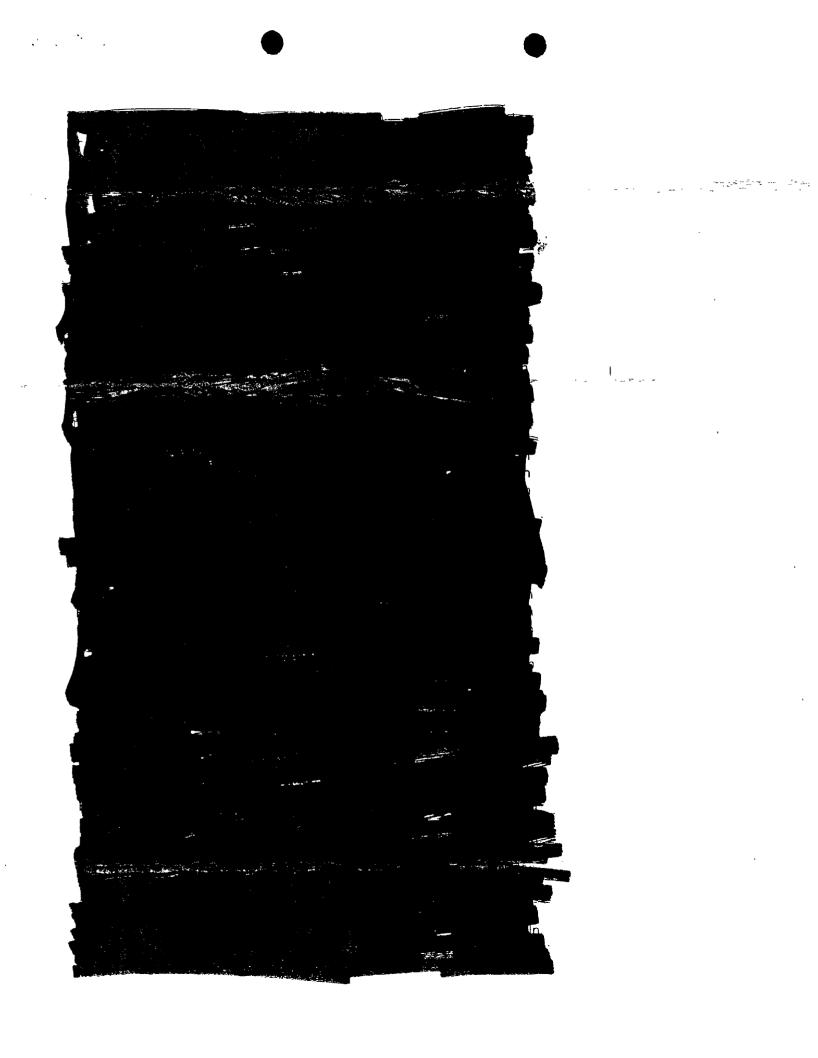


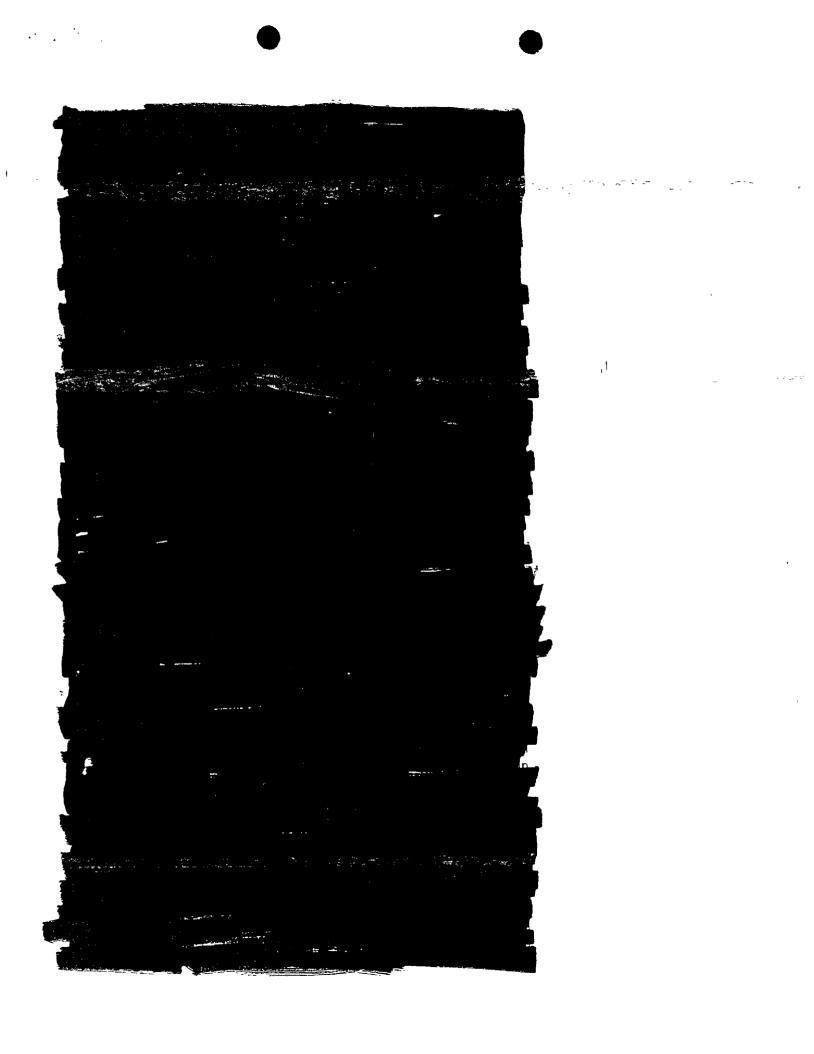


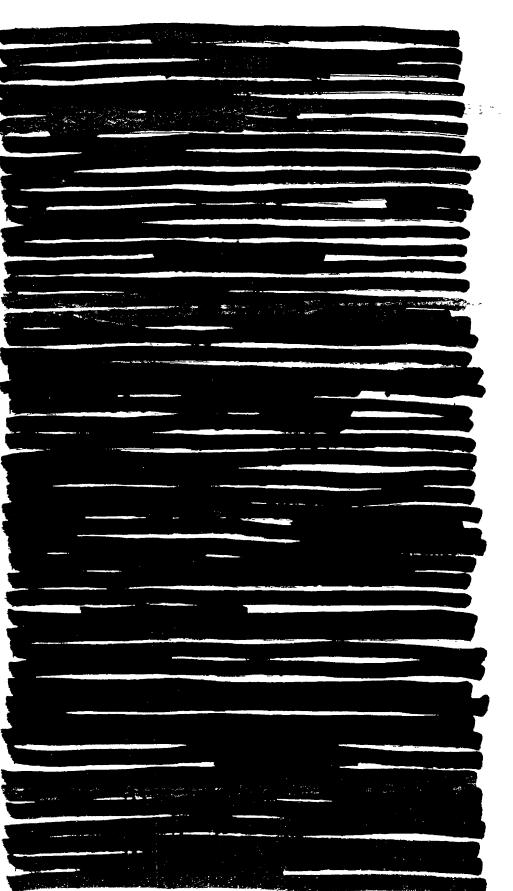










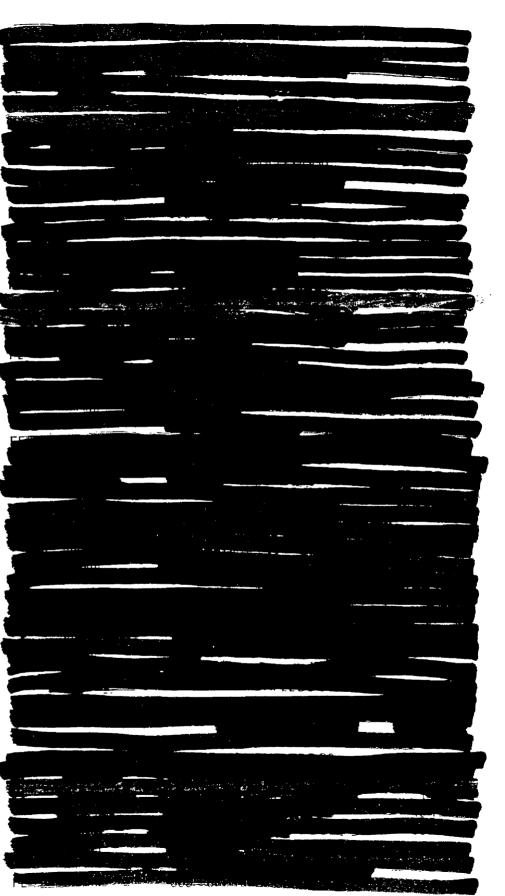


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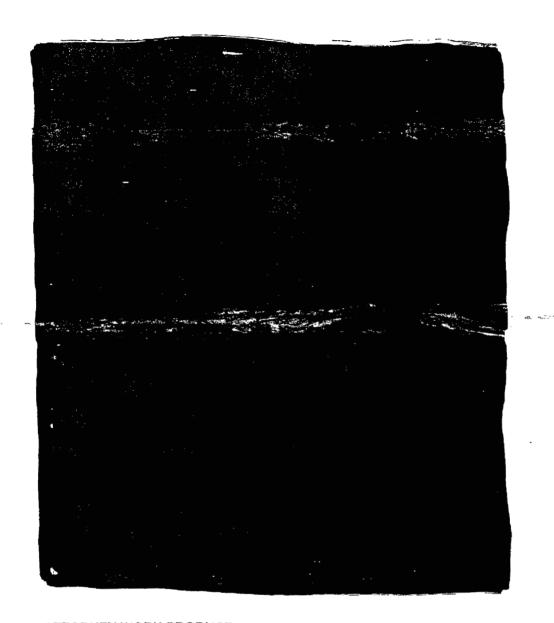
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements)	
arising from Federal Communications)	Docket No. 030851-TP
Commission triennial UNE review:)	DOCKEL ING. USUGSI-11
Local Circuit Switching for Mass)	
Market Customers)	•

COMCAST'S SUPPLEMENTAL RESPONSE TO INTERROGATORY NO 5

- 5. Does this switch serve customer locations with:
 - 1 line only? a.
 - 2 or fewer lines? b.
 - 3 or fewer lines?
 - 4 or fewer lines? d.
 - 5 or fewer lines? e.
 - 6 or fewer lines? f.
 - 7 or fewer lines?
 - g.
 - 8 or fewer lines? h. 9 or fewer lines? i.
 - 10 or fewer lines? j.

Respondent: David Sered, Director of Regulatory Affairs

Response:

Comcast Phone objects to this interrogatory on the grounds that it is unduly burdensome. In particular, the request for information by ranges of lines is unduly burdensome because Comcast Phone does not maintain information in that format. In order to provide such information in that format, the company would be required to undertake a special study which would be burdensome and outside the ordinary course of the company's business.

Subject to the foregoing, and without waiving any objection, although Comcast does not track the information requested, Comcast states that the average number of lines per subscriber in Florida as of October 1, 2003 was [BEGIN CONFIDENTIAL INFORMATION] HEND CONFIDENTIAL INFORMATION].

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COMCAST PHONE OF FLORIDA, LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "C"

Pursuant to Rule 25-22.006(4)(c), Comcast Phone submits herewith its justification for confidential classification.

1. Documents: BellSouth's Interrogatory No. 1.

Line/Column: All highlighted text.

Justification: This is competitive, sensitive, and confidential business information of Comcest Phone that identifies each switch used to provide qualifying service in the State of Florida that is owned, leased, rented or otherwise obtained. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers because Comcast Phone does not have access to this information as it pertains to all of its competitors. Additionally, Comcast Phone is prohibited from disclosing such information due to a Confidentiality Agreement entered into by Comcast Phone as part of the November, 2002 Acquisition of AT&T Broadband Corporation by Comcast Cable Communications Holdings, Inc.

2. Documents: BellSouth's Interrogatory No. 2.

Line/Column: All highlighted text.

Justification: This is competitively sensitive, confidential business information of Comcast Phone that identifies the number of voice/grade equivalent DSO lines served by Comcast Phone using the arrangement described in response to Interrogatory No. 1. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers and give Comcast Phone's competitors an unfair competitive advantage. Such disclosure is unfair to Comcast Phone since it does not have access to this same information from its competitors. Comcast Phone further objects to the disclosure of this information on the grounds that such disclosure would require Comcast Phone to violate confidentiality agreements.

3. Documents: Response to BellSouth's Interrogatory No. 3.

Line/Column: All highlighted text.

Justification: This is competitively sensitive, confidential business information of Comcast Phone that identifies the number of DSO-voice/grade equivalent access lines currently in use in the State of Florida. Comcast Phone maintains this information as confidential and disclosure of the information

would cause harm to Comcast Phone and Florida rate payers and give Comcast Phone's competitors an unfair competitive advantage. Such disclosure is unfair to Comcast Phone since it does not have access to this same information from its competitors. Comcast Phone further objects to the disclosure of this information on the grounds that such disclosure would require Comcast Phone to violate confidentiality agreements.

4. Documents: Response to BellSouth's Interrogatory No. 7.

Line/Column: All highlighted text.

Justification: This is competitive, sensitive, and confidential business information of Comcast Phone that identifies each switch used to provide qualifying service in the State of Florida that is owned, leased, rented or otherwise obtained. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers because Comcast Phone does not have access to this information as it pertains to its competitors. Additionally, Comcast Phone is prohibited from disclosing such information due to a Confidentiality Agreement entered into by Comcast Phone as part of the November, 2002 Acquisition of AT&T Broadband Corporation by Comcast Cable Communications Holdings, Inc.

5. Documents: Confidential Exhibit "A" to Comcast Phone's response to BellSouth's First Set of Interrogatories dated November 14, 2003.

Line/Column: All highlighted text.

Justification: This is competitive, sensitive, and confidential business information of Comcast Phone that identifies the number of voice/grade equivalent DSO lines currently provided by Comcast Phone in the State of Florida listed by Rate Center. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers because Comcast Phone does not have access to this information as it pertains to its competitors.

6. Documents: Confidential Exhibit "A" to Comcast Phone's Second Amended Response to BellSouth's First Set of Interrogatories dated December 2, 2003.

Line/Column: All highlighted text.

Justification: This is competitive, sensitive, and confidential business information of Comcast Phone that identifies the number of voice/grade DSO lines in the State of Florida, listed by NPA/NXX. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers because Comcast Phone does not have access to this information as it pertains to its competitors.

7. Documents: Comcast Phone's Supplemental Response to Interrogatory No. 5 contained in Comcast Phone's Third Amended Response to BellSouth's First Interrogatories.

Line/Column: All highlighted text.

Justification: This is competitive, sensitive, and confidential business information of Comcast Phone that identifies the average number of lines per subscriber in the State of Florida. Comcast Phone maintains this information as confidential and disclosure of the information would cause harm to Comcast Phone and Florida rate payers because Comcast Phone does not have access to this information as it pertains to its competitors.