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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition to Establish Generic Docket
To Consider Amendments to Interconnection
Agreements Resulting from Changes of
Law.

Docket No. 041269-TP

Filed: November 7, 2005

COMMISSION
CLERK

**IDS TELCOM CORP.'S FIRST
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

IDS TELCOM CORP. (IDS), pursuant to Rule 25-22.006, Florida Administrative Code, files this First Request for Specified Confidential Classification.

1. On October 17, 2005 IDS responded to BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories to Network Telephone (Nos. 1- 3). Responses number 2 and number 3 contain information that is confidential proprietary business information regarding IDS's wire center locations and status.

2. Because the discovery responses contain information that is confidential and proprietary, IDS simultaneously filed a Notice of Intent to Request Confidential Classification pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, in order to allow the Commission to take possession of the responses without delay.

CMP 1 3. Section 364.183, Florida Statutes, provides an exemption from the disclosure
COM _____ requirements of section 119.07, Florida Statutes, when disclosure of confidential business
CTR _____ information would "impair the competitive business of the provider of the information."
ECR _____
GCL 1 Disclosure of the information in responses numbers 2 and 3 would impair IDS's competitive
OPC _____ interests by placing details of its business operations, specifically line types, status and locations
RCA _____ used by IDS, in the public domain. Accordingly, the information should be exempt from the
SCR _____ public disclosure requirements of section 119.07, Florida Statutes. Further, IDS considers and
SGA _____

SEC 1

OTH 1 conf records

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

treats this information as confidential and proprietary. A more specific description of the exhibit information is contained in Attachment A.

4. Appended hereto as Attachment B are two copies of the requested documents with the confidential classification redacted.

5. Appended hereto as Attachment C is a sealed envelope containing one copy of the documents that IDS claims are confidential and proprietary.

WHEREFORE, based on the foregoing, IDS moves the Commission to enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman
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Attorneys for IDS Telcom Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request Confidential Classification was served on the following by electronic mail and U.S. Mail this 7th day of November 2005:

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s/Vicki Gordon Kaufman
Vicki Gordon Kaufman

ATTACHMENT A

DOCKET NO. 041269-TP

**IDS's
FIRST REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Explanation of Proprietary Information

1. The copies contain **CONFIDENTIAL** information regarding the location and status of IDS's lines and circuits. This information is related to IDS's ongoing business affairs and operations and can be used by competitors to harm competitive interests. Section 364.183, Florida Statutes, allows for an exemption from the disclosure requirements of section 119.07, Florida Statutes, when disclosure would "impair the competitive business of the provider of the information." Therefore, the information should be shielded from disclosure pursuant to section 119.07, Florida Statutes and section 24 (a), Art. 1 of the State Constitution.

Attachment to IDS's Response to BellSouth's Interrogatory No. 2

<u>Page Nos.</u>	<u>Line(s)</u>	<u>Reason</u>
1	22-23	1
2	6-42	1

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition to establish generic docket to consider amendments to interconnection agreements resulting from changes in law, by BellSouth Telecommunications, Inc. DOCKET NO. 041269-TP

IDS TELCOM CORP.'S¹ RESPONSES TO
BELLSOUTH'S FIRST SET OF INTERROGATORIES (NOS. 1 - 3)

IDS TELCOM CORP. (IDS), pursuant to rule 28.106-206, Florida Administrative Code, rule 1.340, Florida Rules of Civil Procedure, and Order No. PSC-05-0736-PCO-TP, hereby responds to BellSouth Telecommunications, Inc.'s (BellSouth) First Set of Interrogatories (Nos. 1-3).

INTERROGATORIES

1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein IDS is a fiber-based collocator.

1) RESPONSE:

IDS does not have fiber facilities in any BellSouth LSO in any of the listed states.

2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which IDS has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not IDS considers such arrangements to qualify as "fiber-based collocation" pursuant to the FCC's definition. Please describe with specificity the manner in which IDS obtains fiber. If IDS contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

2) RESPONSE:

IDS is collocated in [REDACTED] er. Thus, IDS is not a fiber based collocator.

3. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which IDS has an active collocation arrangement(s) and obtains access to transport facilities from another entity that is not BellSouth, whether or not IDS considers such facilities to qualify as "comparable transmission facilities" pursuant to the FCC's definition. Please

¹ IDS Telcom Corp. is the successor company to IDS Telcom, LLC.

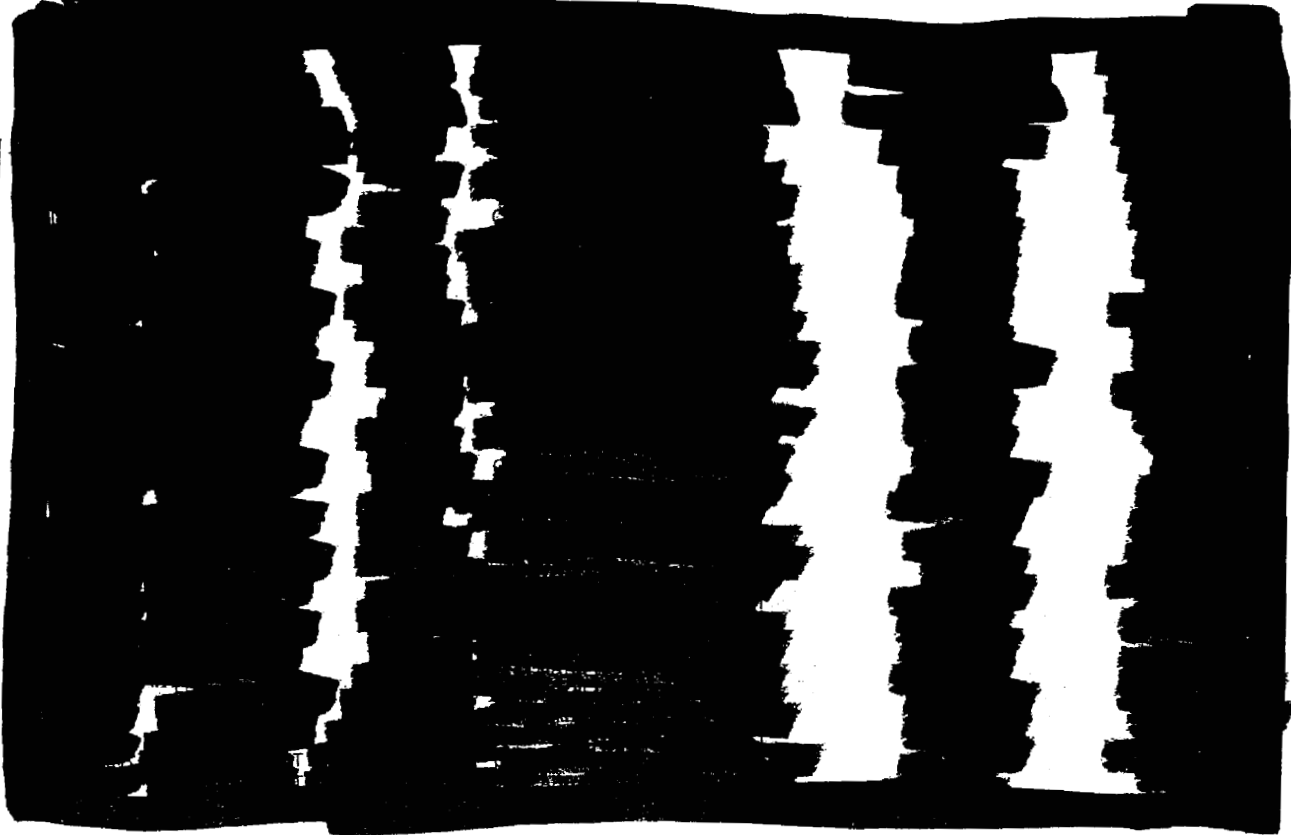
1 describe with specificity the manner in which IDS obtains such facilities or transport and
2 the quantity and bandwidth/capacity of such facilities, both activated and not currently
3 activated. If IDS contends that it is not a fiber based collocator in any such wire center,
4 please explain with specificity the basis for this contention.

5 RESPONSE:

As shown in the chart below

Thus, IDS is not a fiber based collocator.

*6
lines
6-42
redacted
completely



s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman

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1. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee wherein IDS is a fiber-based collocator.

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IDS does not have fiber facilities in any BellSouth LSO in any of the listed states.

2. Please identify any wire centers in the states of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in which IDS has an active collocation arrangement(s) and obtains fiber or fiber capacity from another entity that is not BellSouth, whether or not IDS considers such arrangements to qualify as "fiber-based collocation" pursuant to the FCC's definition. Please describe with specificity the manner in which IDS obtains fiber. If IDS contends that it is not a fiber based collocator in any such wire center, please explain with specificity the basis for this contention.

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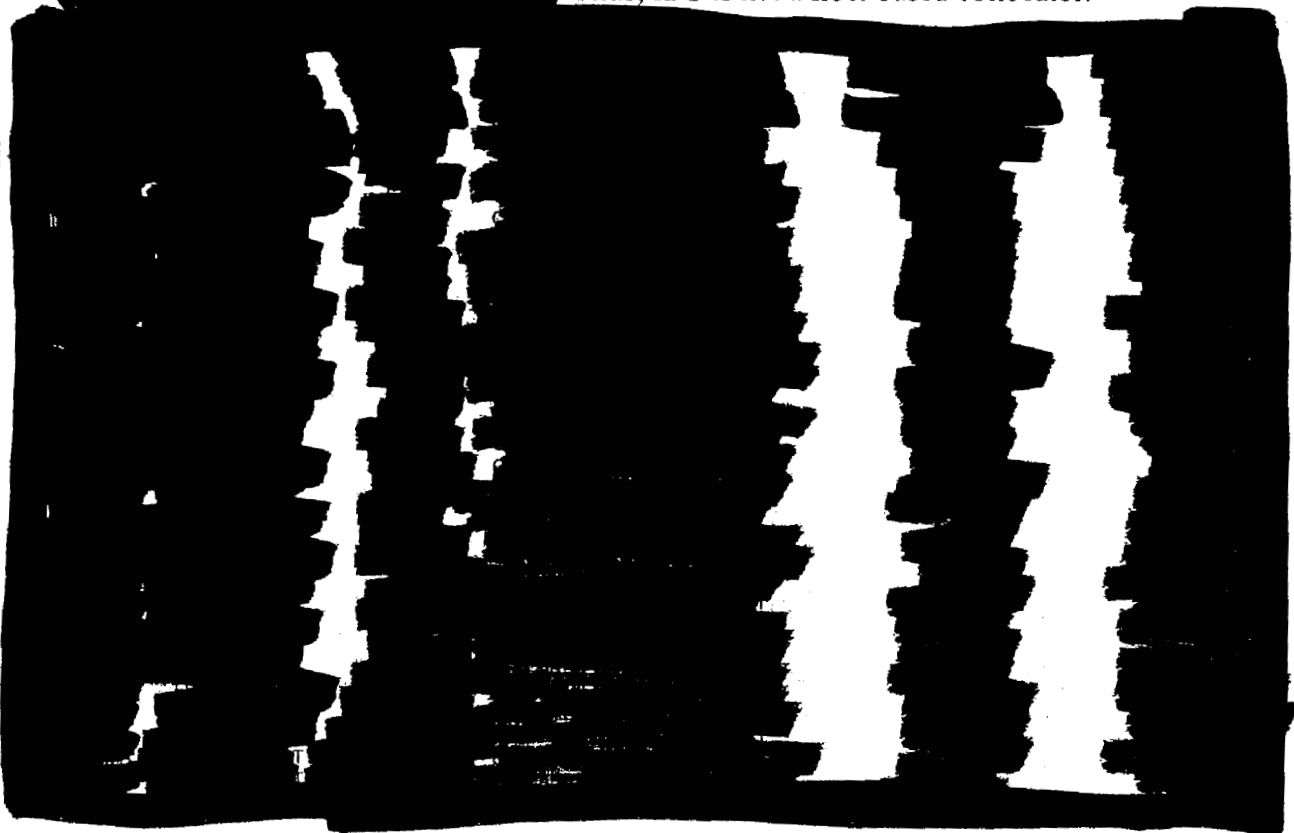
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- 2 the quantity and bandwidth/capacity of such facilities, both activated and not currently
- 3 activated. If IDS contends that it is not a fiber based collocator in any such wire center,
- 4 please explain with specificity the basis for this contention.

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As shown in the chart below

Thus, IDS is not a fiber based collocator.



s/ Vicki Gordon Kaufman

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