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August 29, 2007

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

Re: <u>Docket No.: 070357-TL</u> Petition of AT&T Florida for Relief from Carrier-of-Last-Resort Obligations Pursuant to Florida Statutes §364.025(6)(d) (Cabana South)

Dear Ms. Cole:

Enclosed is an original and fifteen copies of BellSouth Telecommunications, Inc. d/b/a ("AT&T Florida's") Request for Specified Confidential Classification for its Responses to Staff's First Data Request Nos. 2(a), 2(b) and 10, which we ask that you file in the captioned docket.

GCL 2

CMP

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SGA <u>cc</u>: All parties of record Jerry Hendrix E. Earl Edenfield, Jr. OTH <u>Icon</u> James Meza III Sincerely, Manuel A. Ourdian

DOCUMENT NUMPER-DATE 07816 AUG 29 5 **FPSC-COMMISSION CLERK**

CERTIFICATE OF SERVICE Docket No. 070357-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

(*) Electronic Mail and First Class U. S. Mail this 29th day of August, 2007 to the

following:

Patrick Wiggins (*) Rick Mann (*) Staff Counsels Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 pwiggins@psc.state.fl.us rmann@psc.state.fl.us

Cabana South Beach Apartments LP

Attention: Cabana SB of Gainesville 7875 AIA South St. Augustine, FL 32080

Registered Agent

Andrew O'Malley 712 South Oregon Avenue Tampa, FL 33606

Cabana SB of Gainesville, Inc.

Attention: David H. Fort – President 7875 AIA South St. Augustine, FL 32080

Registered Agent

Andrew O'Malley 712 South Oregon Avenue Tampa, FL 33606

Fort Group Development Corp.

Attention: David H. Fort – President 7875 AIA South St. Augustine, FL 32080

Registered Agent

Andrew O'Malley 712 South Oregon Avenue Tampa, FL 33606

C.A.M.P.U.S. Development Group, Inc.

Attention: David H. Fort – President 7875 AIA South St. Augustine, FL 32080

Registered Agent

Andrew O'Malley 712 South Oregon Avenue Tampa, FL 33606

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Florida for Relief from Carrier-of-Last-Resort Obligations Pursuant to Florida Statutes §364.025(6)(d) (Cabana South) Docket No. 070357-TL

Filed: August 29, 2007

AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183, Florida Statutes, files its Request for Specified Confidential Classification.

1. On August 8, 2007, AT&T Florida filed its Responses to the Staff's First Data Request in the captioned docket. AT&T Florida's Responses to Staff's Data Request Nos. 2(a), 2(b) and 10 contain information to be considered confidential business information. A Notice of Intent to Request Specified Confidential Classification was also filed on the same day.

2. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because the above documents contain information considered confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. A more specific description of this information is contained in Attachment A.

3. Public disclosure of this information would cause competitive harm to AT&T Florida and provide competitors with an unfair advantage. The information discussed in this Request for Specified Confidential Classification is valuable and AT&T Florida strives to keep it secret. Therefore, such information should be classified as confidential business information pursuant to Section ancument NUMPER-DATE

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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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4. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated by AT&T Florida as confidential.

5. Attachment B to AT&T Florida's Request for Confidential Classification is redacted copies of the document containing the confidential information.

6. Attachment C to AT&T Florida'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 29th day of August, 2007.

AT&T FLORIDA

JAMES MEZA III Authorized House Counsel No. 464260 TRACY W. HATCH MANUEL A. GURDIAN c/o Gregory R. Follensbee 150 So. Monroe Street, Suite 400 Tallahassee, FL 32301 (305) 347-5558

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E. EARL ÉDENFIELD JR. AT&T Southeast Suite 4300, AT&T Midtown Center 675 W. Peachtree St., NE Atlanta, GA 30375 (404) 335-0763

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ATTACHMENT A

AT&T FLORIDA FPSC DOCKET NO: 070357-TL REQUEST FOR CONFIDENTIAL CLASSIFICATION PAGE 1 OF 2 8/29/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST DATA REQUEST, NOS. 2 (a), 2 (b) AND 10, FILED AUGUST 8, 2007 IN FLORIDA DOCKET NO. 070357-TL

Explanation of Proprietary Information

- This information contains business information related to competitive interests of BellSouth that is proprietary to BellSouth. Disclosure of this data would impair the competitive business and cause harm to BellSouth. Specifically, this information relates to revenue, the line counts of customers who have bundles and/or features and the average revenue per customer. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 2. This information contains confidential, trade secret business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to correspondence between AT&T Florida and the Developer. This correspondence concerns proposals regarding architecture, technology, timelines and cost for deployment of facilities. This information is not publicly available and disclosure of this data would impair the competitive business and cause harm to AT&T Florida. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 3. This information contains confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to AT&T Florida's Average Revenue per Unit ("ARPU"). This information is not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.
- 4. This information contains confidential business information related to the competitive interests of AT&T Florida that is proprietary to AT&T Florida. Specifically, this information relates to AT&T Florida's Fill Summary Report that reflects a summary of cable and was used to conduct a revenue analysis. These documents are not publicly available. Disclosure of this data would impair the competitive business and cause harm to AT&T Florida. Consequently, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and is exempt from the Open Records Act.

ATTACHMENT A

AT&T FLORIDA FPSC DOCKET NO: 070357-TL REQUEST FOR CONFIDENTIAL CLASSIFICATION PAGE 2 OF 2 8/29/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST DATA REQUEST, NOS. 2 (a), 2 (b) AND 10, FILED AUGUST 8, 2007 IN FLORIDA DOCKET NO. 070357-TL

Data Request No. 2 (a) - Attachment

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Location	Reason
Pg 1, FL column	1
Pg 2, All numbers and percentages	1
Pg 3-6, Entire page	4
Pg 7-14, Entire page	1

Data Request No. 2 (b) - Response

Location	Reason
Response – Subpart (b), 1 st line	3
<u> Data Request No. 10 - Attachment</u>	

Location	Reason
Entire Page Nos. 2-20, 28, 36, 39, 42, 48-51, 56, 58, 59	2

ATTACHMENT B

AT&T FLORIDA FPSC DOCKET NO: 070357-TL REQUEST FOR CONFIDENTIAL CLASSIFICATION PAGE 1 OF 1 8/29/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST DATA REQUEST, NOS. 2 (a), 2 (b) AND 10, FILED AUGUST 8, 2007 IN FLORIDA DOCKET NO. 070357-TL

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TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

AT&T FLORIDA FPSC DOCKET NO: 070357-TL REQUEST FOR CONFIDENTIAL CLASSIFICATION PAGE 1 OF 1 8/29/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S RESPONSE TO STAFF'S FIRST DATA REQUEST, NOS. 2 (a), 2 (b) AND 10, FILED AUGUST 8, 2007 IN FLORIDA DOCKET NO. 070357-TL

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ONE HIGHLIGHTED COPY



Commissioners: Lisa Polak Edgar, Chairman Matthew M. Carter II Katrina J. McMurrian Nancy Argenziano Nathan A. Skop

STATE OF FLORIDA



OFFICE OF COMMISSION CLERK ANN COLE COMMISSION CLERK (850) 413-6770

Hublic Service Commission

ACKNOWLEDGEMENT

DATE: 8/29/07

TO: M. Gurdian\AT&T

FROM: Ruth Nettles , Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

(DN01811-01)

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number <u>070357-TL</u> or, if filed in an undocketed matter, concerning <u>Responses to Staff's 1st data</u> request Nos. 2a, 2b, and 10, and filed on behalf of <u>AT&T</u>. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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