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September 10, 2007

RECEIVED-FPSC
 07 SEP 10 PM 4:13
 COMMISSION
 CLERK

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

Re: Docket No. 050863-TP: dPi Teleconnect, L.L.C. v. BellSouth Telecommunications, Inc.

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 Request for Production Nos. 3 and 6, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Manuel A. Gurdian

- CMP
- COM
- CTR
- ECR
- GCL
- OPC
- RCA
- SCR
- SGA
- SEC
- OTH *LCM records*

cc: All parties of record
 Jerry Hendrix
 E. Earl Edenfield, Jr.
 James Meza III

This confidentiality request was filed by or for a "telco" for DN 08205-07. 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-ref. 07383-07)

DOCUMENT NUMBER-DATE

08204 SEP 10 6

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 050863-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail and First Class U. S. Mail this 10th day of September, 2007 to the following:

Theresa Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

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Foster Malish Blair & Cowan LLP
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Counsel for dPi

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Dallas, TX 75234-7627
Tel. No. (972) 488-5500 x4001
Fax No (972) 488-8636
ddorwart@dpiteleconnect.com



Manuel A. Gurdian

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re:) Docket No. 050863-TP
)
dPi Teleconnect, L.L.C. v.)
BellSouth Telecommunications, Inc.) Filed: September 10, 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 20, 2007, AT&T Florida filed its Responses to Staff's First Set of Interrogatories (Nos. 1 - 6) and First Request for Production of Documents (Nos. 1 - 7). AT&T Florida's Response to Request for Production Nos. 3 and 6 contain information to be considered confidential business information. A Notice of Intent to Request Specified Confidential Classification was also filed on that same day.

2. Pursuant to Rule 25-22.006, AT&T Florida hereby files this Request for Specified Confidential Classification because the above document contains 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 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.

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 10th day of September, 2007.

AT&T FLORIDA



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Authorized House Counsel No. 464260
TRACY W. HATCH
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(404) 335-0710

ATTACHMENT A

**AT&T FLORIDA
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REQUEST FOR CONFIDENTIAL CLASSIFICATION
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9/10/2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR DOCUMENTS, NOS. 3 AND
6, FILED AUGUST 20, 2007 IN FLORIDA DOCKET NO. 050863-TL**

Explanation of Proprietary Information

1. This information contains competitive business information. The subject information includes internal methods and procedures, standards and guidelines and/or job aids pertaining to Resale Promotions and Credit Processing. This information also includes detailed plans for a mechanization tool developed to aid in Credit Processing. This information is valuable, it is used by BellSouth in conducting its business and BellSouth strives to keep it secret. Therefore, such information is a trade secret which 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 proprietary business information of dPi. Specifically, this information contains line counts submitted by dPi to AT&T Florida for promotional credits, broken down to lines denied and for what reasons. 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
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POD NO. 3

<u>Location</u>	<u>Reason</u>
Pgs 2-5, 7-10, 14-16, 18-19, 21-23, 25-27, 29-31, 33 – Entire Page	1

POD NO. 6

<u>Location</u>	<u>Reason</u>
# of Lines Submitted Column	2
# of Lines Denied	2
# of Lines Denied because not enough features	2
# of Lines Denied because existing customer	2
# of Lines Denied because new customer	2
# of Lines Denied because Exceeds 12 months	2

ATTACHMENT B

**AT&T FLORIDA
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TWO REDACTED COPIES FOR PUBLIC DISCLOSURE

ATTACHMENT C

**AT&T FLORIDA
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6, FILED AUGUST 20, 2007 IN FLORIDA DOCKET NO. 050863-TL**

ONE HIGHLIGHTED COPY

STATE OF FLORIDA

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



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

CONFIDENTIAL

Public Service Commission

ACKNOWLEDGEMENT

DATE: 9/10/07

TO: AT&T/Gurdian

FROM: Ruth Nettles , Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 050863-TP or, if filed in an undocketed matter, concerning Responses to staff's 1st request for production, Nos. 3 and 6, and filed on behalf of AT&T. 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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