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March 5, 2010

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VIA Hand Delivery

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

Re: Docket No. 090501-TP: Petition for arbitration of certain terms and conditions of an interconnection agreement with Verizon Florida LLC by Bright House Networks Information Services (Florida), LLC

Dear Ms. Cole:

Enclosed for filing in the above-referenced Docket, please find the original and 7 copies of Bright House Networks Information Services (Florida), LLC's Motion for Protective Order and Request for Confidential Treatment of portions of its Responses to Verizon's First Set of Interrogatories (1- 21) and First Requests for Production of Documents (Nos. 1 – 8). Included with this filing is one copy of the information and documents for which confidential classification is requested with the subject confidential information highlighted, as well as two additional copies with the confidential information redacted.

COM _____
APA _____
ECR _____
GCL 1 _____
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Thank you for your assistance with this filing. If you have any questions whatsoever,

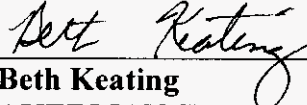
Enclosures
cc: Parties of Record
Staff Counsel

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Ms. Ann Cole
March 5, 2010
Page 2

please do not hesitate to contact me.

Sincerely,



Beth Keating

AKERMAN SENTERFITT

106 East College Avenue, Suite 1200

Tallahassee, FL 32302-1877

Phone: (850) 224-9634

Fax: (850) 222-0103

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of certain terms and conditions of an interconnection agreement with Verizon Florida LLC by Bright House Networks Information Services (Florida), LLC

Docket No. 090501-TP
Filed: March 5, 2010

BRIGHT HOUSE NETWORKS INFORMATION SERVICES (FLORIDA),LLC'S
REQUEST FOR CONFIDENTIAL TREATMENT
AND MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 25-22.006 (4) and (6), Florida Administrative Code, Bright House Networks Information Services (Florida), LLC, through their attorneys, respectfully submit this Request for Confidential Treatment and Motion for Protective Order regarding information contained in its Responses to Verizon's First Set of Interrogatories (1- 21) and First Requests for Production of Documents (Nos. 1-8). Provided with this Request is a copy of the responses with the confidential information highlighted, as well as two, public redacted versions of the information. Confidential information contained in these responses has only been disseminated to Verizon in accordance with a signed protective agreement limiting disclosure.

In support of its request, Bright House states that certain information contained in these supplemental responses fits the definition of "proprietary confidential business information", which is defined as:

"Proprietary confidential business information" is defined as meaning "information, regardless of form or characteristics, which is owned or controlled by the ... company, is intended to be and is treated by the ... company as private in that the disclosure of the information would cause harm to the ratepayers or the 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."

§ 364.183(3), Fla. Stat.

DOCUMENT NUMBER-DATE
01551 MAR-5 2010
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Furthermore, Section 364.183, Florida Statutes, provides that information relating to a company's competitive interests, which if disclosed would negatively impact the company's competitive interests, shall be considered to be "proprietary confidential business information," and thus, exempt from Section 119.07 (1), Florida Statutes.

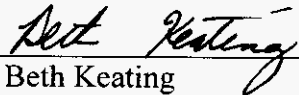
Certain information in the responses would, if disclosed, provide competitors with information regarding marketing strategies, and the effectiveness thereof, which would allow such competitors an unfair advantage in crafting competitive strategies targeted at Bright House's operations.

Specifically, Bright House seeks confidential treatment of the highlighted information provided in response to Interrogatories 1, 3, 5, 13, 14, 15, and 16. This information is not otherwise readily available in the market, and divulging it in this context would certainly provide competitors with an unfair market advantage. Bright House has, and continues to, treat this information as proprietary, confidential business information. Bright House has not otherwise disclosed this information outside of a proprietary agreement.

Thus, Bright House respectfully asks that this information be granted confidential

treatment and be made subject to an appropriate protective order.

Respectfully submitted this 5th day of March, 2010.

By: 
Beth Keating

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*Attorneys for Bright House Networks
Information Services, LLC
Bright House Networks, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via Hand Delivery* and U.S. Mail
on March 5, 2010 to:

Dulaney L. O'Roark, III, VP/General Counsel Verizon Florida, LLC P.O. Box 110, MC FLTC 0007 Tampa, FL 33601 de.oroark@verizon.com	David Christian * Verizon Florida, Inc. 106 East College Ave. Tallahassee, FL 32301-7748 David.christian@verizon.com
Jamie Morrow, Staff Counsel* Florida Public Service Commission, Office of the General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jmorrow@psc.state.fl.us	Kevin Bloom, Division of Regulatory Analysis* Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 KBloom@psc.state.fl.us

By: *Beth Keating*

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STATE OF FLORIDA



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Public Service Commission

ACKNOWLEDGEMENT

DATE: March 5, 2010

TO: Beth Keating, Akerman Law Firm

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 090501** or, if filed in an undocketed matter, concerning portions of responses to Verizon's 1st set of Interrogatories, Nos. 1-21, and 1st Request for PODs, Nos. 1-8, and filed on behalf of Bright House Networks Information Services (Florida), Llc. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.

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