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May 5, 2008

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COMMISSION
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Hand Delivery

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

Re: DOCKET NO. 070691-TP - Complaint and request for emergency relief against Verizon Florida LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida) LLC, and its affiliate, Bright House Networks, LLC

DOCKET NO. 080036-TP - Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

Dear Ms. Cole:

Enclosed for filing in the above-referenced consolidated Dockets, please find an original and 15 copies of Bright House Networks, LLC's Request for Confidential Treatment and Motion for Protective Order for portions of its Responses to Staff's First Set of Interrogatories (1- 17). Included with this filing, are one highlighted two redacted copies of the information for which confidential treatment is request.

Thank you for your assistance with this filing. If you have any questions whatsoever,

DOCUMENT NUMBER-DATE

03695 MAY-5 8

FPSC-COMMISSION CLERK

This confidentiality request was filed by or for a "telco" for DNO3696-08. 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.

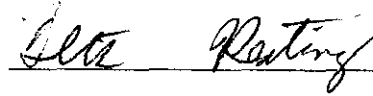
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Ms. Ann Cole
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please do not hesitate to contact me.

Sincerely,



Beth Keating
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and request for emergency relief against Verizon Florida LLC for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services (Florida) LLC, and its affiliate, Bright House Networks, LLC

Docket No. 070691-TP

In re: Complaint and request for emergency relief against Verizon Florida, L.L.C. for anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and 364.10, F.S., and for failure to facilitate transfer of customers' numbers to Comcast Phone of Florida, L.L.C. d/b/a Comcast Digital Phone.

Docket No. 080036-TP
Filed: May 5, 2008

**BRIGHT HOUSE NETWORKS' REQUEST FOR CONFIDENTIAL TREATMENT
AND MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 25-22.006 (4) and (5), Florida Administrative Code, Bright House Networks Information Services (Florida), LLC, and its affiliate, Bright House Networks, LLC (together, "Bright House"), through their attorneys, respectfully submit this Request for Confidential Treatment and Motion for Protective Order regarding information contained in its response to Staff's Interrogatory 10 to Bright House. Attached to this Request is an envelope marked "CONFIDENTIAL" containing the sole copy of the confidential information being provided with the confidential information highlighted, as well as two, public redacted versions of the information.

In support of its request, Bright House states that certain information contained in its response to Interrogatory 10 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.

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 provided in response to Interrogatory 10 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 on page 14, in line 3 of the paragraph that constitutes Bright House's response to Interrogatory No. 10. 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. 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 May, 2008.

By: 
Beth Keating

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and

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via Electronic Mail, U.S. Mail First Class, or Hand Delivery this 5th day of May, 2008, to the persons listed below:

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
Rick Mann, Staff Counsel Florida Public Service Commission, Office of the General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 rmann@psc.state.fl.us Charlene Poblete, Staff Counsel Florida Public Service Commission Office of the General Counsel 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 cpoblete@psc.state.fl.us	Beth Salak, Director/Competitive Markets and Enforcement 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 bsalak@psc.state.fl.us Floyd R. Self, Esquire Messer, Caparello & Self, P.A. 2618 Centennial Place Tallahassee, FL 32308



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STATE OF FLORIDA



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

Public Service Commission

ACKNOWLEDGEMENT

DATE: May 5, 2008

TO: Beth Keating, Esquire

FROM: Marguerite H. McLean, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Numbers 070691-TP/080036-TP [DN 03696-08] or, if filed in an undocketed matter, concerning responses to staff's 1st set of interrogatories (No. 10), and filed on behalf of Bright House Networks, LLC. The document will be maintained in locked storage.

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