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October 19, 2011

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

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 07665-11, which
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Re: Docket No. 110056-TP - Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC.

Dear Ms. Cole:

Enclosed for filing in the referenced Docket, please find the original and 7 copies of Bright House Networks Information Services (Florida), LLC's "Claim" of Confidentiality for information contained in its Responses to the First Set of Interrogatories and First Requests for Production of Documents from MCI Communications Services, Inc. d/b/a Verizon Business Services. With this filing, BHNIS also submits one highlighted and two redacted copies of the information for which confidential treatment is requested.

As always, please don't hesitate to contact me if you have any questions or concerns. Thank you for your assistance with this filing.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint against Verizon Florida, LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service by Bright House Networks Information Services (Florida), LLC

Docket No. 110056-TP

BRIGHT HOUSE NETWORKS INFORMATION SERVICES (FLORIDA), LLC'S
"CLAIM" OF CONFIDENTIALITY

In accordance with Rule 25-22.006(5), Florida Administrative Code, Bright House Networks Information Services (Florida), LLC, ("BHNIS") respectfully requests that the Commission afford confidential treatment to certain information provided by BHNIS in its responses to the First Set of Interrogatories (1-38) and First Requests for Production of Documents (1-11) from MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon"), pursuant to the so-called "claim" provisions.

Specifically, BHNIS and Verizon have entered into a strict Protective Agreement, whereby BHNIS has agreed to provide, in response to Verizon's discovery requests, information and documents, which constitute "proprietary confidential business information" as that term is defined in Section 364.183(3), Florida Statutes. Consistent with the provisions of the Order Establishing Procedure for this Docket, Order No. 11-0417-PCO-TP, copies of discovery and responses are to be provided to the Commission staff. The information at issue includes contracts that are subject to confidentiality provisions and specific revenue information that has not otherwise been disclosed in the form presented, as well as corporate information that also is not in the public domain. BHNIS treats all of this information as confidential.

BHNIS recognizes that, pursuant to paragraph 5(c) of the Rule, BHNIS will be required to file a Request for Confidentiality in accordance with paragraph 4 if the materials become the subject of a public records request or in any case, prior to hearing in this matter, if it appears likely that the materials will be used in the Commission's proceeding.

In accordance with the Rule, BHNIS is submitting with this filing, one highlighted and two redacted copies of the information that is the subject of this "claim."

WHEREFORE, BHNIS respectfully requests that this information be afforded confidential classification in accordance with Rule 25-22.006(5), Florida Administrative Code.

Respectfully submitted this 19th day of October, 2011,

By:  _____

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Attorneys for: *Bright House Networks Information Services (Florida), LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by email, and/or Hand Delivery this 19th day of October, 2011.

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