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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION SEP 21 AM 9: 32

In re: Request for arbitration concerning
Complaint of IDS Telcom, LLC against BellSouth
Telecommunications, Inc., regarding breach of
interconnection agreement

Docket No. 010740-TP CLERK

Filed: September 21, 2001

IDS TELCOM'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

Comes now, IDS Long Distance, Inc. n/k/a IDS Telcom, LLC ("IDS") and pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, files its Request for Specified Confidential Classification, and states the following:

- 1. IDS is filing a Request for Confidential Classification for Late Filed Deposition Exhibit No. 1 to the Deposition of Keith Kramer and Rebuttal Testimony Exhibit KK-23 to the Rebuttal Testimony of Keith Kramer.
- 2. Late Filed Deposition Exhibit No. 1 contains proprietary confidential business information pursuant to Section 364.183(3), Florida Statutes. Disclosure of the information would cause harm to IDS' business operations and would impair the competitive business of IDS. Exhibit KK-23 to Keith Kramer's Rebuttal Testimony contains customer proprietary information which is clearly confidential and proprietary under Florida Statutes, Sections 364.183 and 364.24. Accordingly, the exhibit should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.
- 3. IDS has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

This confidentiality request was filed by or for a "telco" for DN 1846-21. 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.

DOCUMENT NUMBER-DATE

4. Attachment A contains two copies of the requested document with the confidential information deleted. Attachement B is a sealed envelope containing one highlighted copy of the document including those portions that are confidential.

WHEREFORE, based on the foregoing, IDS respectfully requests that the Commission enter an order declaring the information described above to be confidential information that is not subject to public disclosure.

Respectfully submitted this 21th day of September, 2001.

Bruce Culpepper

AKERMAN, SENTERFITT & EIDSON, P.A.

301 South Bronough Street, Suite 200 Post Office Box 10555 Tallahassee, Florida 32302-2555

Phone: (850) 222-3471 Fax: (850) 222-8628

John F. O'Sullivan Brian Miller Douglas O'Keefe

AKERMAN, SENTERFITT & EIDSON, P.A.

SunTrust International Center, 28th Floor One Southeast Third Avenue Miami, Florida 33131-1704

Phone: (305) 374-5600 Fax: (305) 374-5095

Suzanne Fannon Summerlin 1311-B Paul Russell Road, Suite 201 Tallahassee, Florida 32301 (850) 656-2288 Fax: (850) 656-5589

Attorneys for IDS Telcom, LLC

CERTIFICATE OF SERVICE

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

furnished via Hand Delivery this 21st day of September, 2001, to:

Mary Anne Helton Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

James Meza III, Esq.
Nancy B. White, Esq.
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, Florida 32301

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ATTACHMENT A

IDS Telcom, LLC FPSC Docket No. 010740-TP

- LATE FILED DEPOSITION EXHIBIT NO. 1 OF KEITH KRAMER
- REBUTTAL TESTIMONY EXHIBIT KK-23

TWO REDACTED COPIES FOR PUBLIC DISCLOSURE