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December 3, 2003

Ms. Blanca Bayo, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

HAND DELIVERY

RECEIVED - FPSC
COMMISSION CLERK
DEC - 3 PM 4:04

Re: 2003 TRO Data Requests in Docket Nos. 030851-TP and 030852-TP

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of US LEC of Florida Inc.'s ("US LEC") Request for Confidential Information and Request for Protective Order in connection with US LEC's Responses to PSC Staff's Data Requests dated November 17, 2003 in the above-referenced dockets. If there are any questions regarding this filing, please contact me at 850-681-6788.

Additionally, please find the hard copies (both confidential and redacted) of the responses to Staff's Requests and an electronic version of each spreadsheet on a compact disc (CD).

Please acknowledge receipt of these items by stamping the extra copy of this letter "filed" and returning the copy to me. Thank you for your assistance with this filing.

Sincerely,

Martin P. McDonnell

Martin P. McDonnell

MPM/rl
Enclosures
cc: Pat Lee
All Parties of Record
USLEC\bayo.123ltr

This confidentiality request was filed by or for a "telco" for DN 1232603. 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.

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL 1
OPC _____
MMS _____
SEC 1
OTH 1 each dkt

cc: conf records

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

12325 DEC-3 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket Nos. 030851-TP and 030852-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers.) Filed: December 3, 2003
_____)

**US LEC OF FLORIDA INC.'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

US LEC of Florida Inc. ("US LEC"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification and a protective order for certain information contained in US LEC's responses to PSC Staff's Information Requests dated November 17, 2003. On December 3, 2003, US LEC filed its Responses to PSC Staff's Requests regarding switching, transport and loop issues. In those responses, US LEC has produced confidential business information that is considered proprietary.

1. All of the information for which US LEC seeks confidential treatment falls within Section 364.183(3), Florida Statutes which defines proprietary confidential business information as follows:

[I]nformation, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or a administrative body, or private agreement that provides that the information will not be released to the public.

Section 364.183(3)(e), Florida Statutes, further provides that proprietary confidential business information includes "information relating to competitive interests, the disclosure of which would

DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

impair the competitive business of the provider of information.”

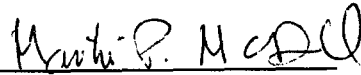
2. If the competitors or potential competitors of US LEC were able to acquire and utilize the proprietary confidential business information contained in US LEC’s responses, they would be in an unfair and advantageous situation which would seriously jeopardize US LEC’s competitive position. Section 364.183(3), Florida Statutes, specifically allows entities such as US LEC to protect its proprietary information so as to preclude competitors from gaining an unfair advantage which skews the operation of the general market, ultimately to the detriment of the telecommunications consumer. US LEC therefore respectfully requests that the Commission classify the identified documents as confidential and enter an appropriate protective order.

3. US LEC understands that pursuant to Section 119.07(1), Florida Statutes, that while a ruling on this request is pending, the information is exempt from public record and will be accorded the stringent protection from disclosure required by Rule 25-22.006(3)(b), Florida Administrative Code.

4. One highlighted copy of the confidential information is attached to the original of this Request as Exhibit A. Two redacted copies are attached as Exhibit B.

WHEREFORE, US LEC respectfully requests confidential classification and a protective order for the information.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail to the following this 3rd day of December, 2003:

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By: Martin P. McDonnell
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US:EC\request

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG						
1					Self-Providers										Wholesalers																								
2	Customer Information					High-Capacity Loop Type			Number of circuits							High-Capacity Loop Type			Number of circuits																				
3	Street Address	City	Zip	Wire Center CLLI	Self-Provider? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Wholesaler? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Point-to-Point (P) or Ring (R) configuration	Accessible? (Y/N)	Sole Access? (Y/N)	Using? (Y/N)	Giving? (Y/N)	Owner? (Y/N)	Loop Owner?	Loop Wholesaler?	Nature of agreement?						
4																																							



remote_switches_questions_FL(non-confidential).xls
 Remote Switch Addresses

	A	B	C	D	E	F	G	H
1	Please list all of your remote switches. Any switches located at the central office, do not need to be added.							
2	Switch CLI	Host CLI	Vertical Coord- inates	Horiz- ontal Coord- inates	Switch Street Address	City	State	Zip
3								

1	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF		
			Type of Switch (X or Blank)																															
2	Wire Center CLLI	Switch CLLI	End Office	Tandem Office	Multi-Function	Remote Line	Packet	Broadband	Other	# of VG provisioned	# of VG in use	Capacity (CCS)	# of Residential	# of Customers with 1 to 3 lines	# of Customers with 4 to 8 lines	# of Customers with 9 lines or more	# Voice only	# Data Service Only	# Voice and Data	Owner?	Wholesaler?	Self-Provider?	FPSC code of Owner	FPSC code of Leasor	Nature of the arrangement	Equipment Type	Define Abbreviations	Function Performed	Class 4 and Class 5 Functions? (Y/N)	NPA-NXX				
3		FTMYFL39DS0																														239-444		
4		FTMYFL39DS0																															239-443	
5		FTMYFL39DS0																															239-425	
6		FTMYFL39DS0																															239-314	
7		FTMYFL39DS0																															239-259	
8		FTMYFL39DS0																															239-280	
9		FTMYFL39DS0																															239-829-1	
10		FTMYFL39DS0																															239-449	
11		FTMYFL39DS0																															239-567-5	
12		FTMYFL39DS0																															239-579	
13		JCVMFLUFDS0																															904-432	
14		JCVMFLUFDS0																															352-224	
15		JCVMFLUFDS0																															904-863	
16		JCVMFLUFDS0																															904-435	
17		JCVMFLUFDS0																															904-421	904-899
18		JCVMFLUFDS0																															904-436	
19		JCVMFLUFDS0																															386-438	
20		JCVMFLUFDS0																															904-458	
21		JCVMFLUFDS0																															386-643	
22		JCVMFLUFDS0																															386-246-1	
23		JCVMFLUFDS0																															904-473	
24		JCVMFLUFDS0																															904-484	
25		JCVMFLUFDS0																															904-494	
26		JCVMFLUFDS0																															386-524	
27		MIAPFLYODS0																															954-905	
28		MIAPFLYODS0																															954-312	
29		MIAPFLYODS0																															954-315	
30		MIAPFLYODS0																															954-874	
31		MIAPFLYODS0																															305-728	305-777
32		MIAPFLYODS0																															305-749	786-528
33		MIAPFLYODS0																															786-581	
34		MIAPFLYODS0																															954-691	
35		MTLDFLBRDS0																															407-598	
36		MTLDFLBRDS0																															321-559	
37		MTLDFLBRDS0																															386-944	
38		MTLDFLBRDS0																															386-232	
39		MTLDFLBRDS0																															321-421	305-779
40		MTLDFLBRDS0																															407-569	
41		MTLDFLBRDS0																															407-842	
42		MTLDFLBRDS0																															321-541	
43		MTLDFLBRDS0																															352-547	
44		MTLDFLBRDS0																															407-581	407-992
45		MTLDFLBRDS0																															407-588	
46		MTLDFLBRDS0																															407-597	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF			
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47		MTLDFLBRDS0																														407-585			
48		MTLDFLBRDS0																															407-217-1		
49		MTLDFLBRDS0																															407-571		
50		MTLDFLBRDS0																															407-573		
51		MTLDFLBRDS0																															407-589		
52		PBGRFLEZDS0																															561-886		
53		PBGRFLEZDS0																															561-853		
54		PBGRFLEZDS0																															561-900		
55		PBGRFLEZDS0																															772-409-1		
56		PBGRFLEZDS0																															772-497		
57		PBGRFLEZDS0																															561-354		
58		PBGRFLEZDS0																															772-408-5		
59		PBGRFLEZDS0																															772-600		
60		PBGRFLEZDS0																															772-469		
61		PBGRFLEZDS0																															561-472		
62		TAMQFLTADS1																															863-535		
63		TAMQFLTADS1																															941-782		
64		TAMQFLTADS1																															727-450		
65		TAMQFLTADS1																															863-547		
66		TAMQFLTADS1																															727-245		
67		TAMQFLTADS1																															863-904		
68		TAMQFLTADS1																															863-913		
69		TAMQFLTADS1																															727-569		
70		TAMQFLTADS1																															941-845		
71		TAMQFLTADS1																															813-305		
72		TAMQFLTADS1																															941-552		
73		TAMQFLTADS1																															727-456		
74		TAMQFLTADS1																															813-739	813-769	
75		TAMQFLTADS1																															813-315		
76		TAMQFLTADS1																															813-751		
77		TAMQFLTADS1																															813-658		
78		TAMQFLTADS1																															813-749		
79		TAMQFLTADS1																															727-756		
80		TAMQFLTADS1																															941-441		
81		TAMQFLTADS1																															863-508		

VERIFICATION

State of North Carolina.....)

) ss.:

County of Mecklenburg.....)

Greg Lunsford verifies and

states: I am the Regulatory Manager of US LEC of Florida Inc.

(Here insert the official title of the deponent) (Here insert exact name of the reporting company)

.....

I am familiar with the preparation of the foregoing information and know generally the contents thereof.
Said information

consists of data request responses in Docket No. 030852-TP

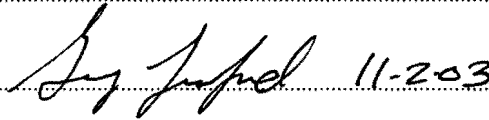
(Here insert exact identification of the information)

.....

is true and correct to the best of my knowledge and belief.

.....

.....



Greg Lunsford

Signature