

ORIGINAL



Fred Goodwin  
Associate Director-Regulatory

SBC Telecom, Inc.  
1010 N. St. Mary's Street  
Room 13-34  
San Antonio, TX 78215  
Phone: 210-246-8755  
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Email: fg8578@sbc.com

February 25, 2004

Blanco Bayó  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

COMMISSION  
CLERK

FEB 26 AM 10:34

FORWARDED FPSC

**RE: Request for Confidential Classification: response of SBC Telecom, Inc. to Staff's Supplemental request for information in Docket No. 030852-TP**

Dear Ms. Bayó:

Enclosed is the response of SBC Telecom, Inc. (SBCT) to the staff's supplemental request for information in the above-referenced proceeding.

Two copies of the public (redacted) version of SBCT's response are enclosed, as well as one copy of the confidential version (unredacted). Also enclosed are electronic copies of both the public and confidential versions.

Attached are two affidavits: the first attests to the accuracy of SBCT's responses to the Staff's supplemental request for information; the second attests to the confidential nature of the information provided in those responses.

Please call me if you have any questions or need additional information.

Sincerely,

Fred Goodwin  
Associate Director-Regulatory

Attachments  
CC: Roberta Bass

AUS  
CAF  
CMP  
COM  
CTR  
ECR  
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OPC  
MMS  
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OTH

DOCUMENT NUMBER-DAT

02825 FEB 26 2004

FPSC-COMMISSION CLERK

**HIGH CAPACITY LOOPS AND TRANSPORT DATA REQUEST  
FOR DOCKET NO. 030852-TP**

records

**VERIFICATION UNDER OATH  
REGARDING CONFIDENTIALITY OF RESPONSE OF SBC TELECOM, INC.  
TO THE SUPPLEMENTAL DATA REQUEST OF THE FLORIDA PSC STAFF**

I, Fred Goodwin, state and attest that the attached response (Response) to the supplemental data request of the Florida Public Service Commission (PSC) Staff is filed on behalf of SBC Telecom, Inc. (SBCT) as required by Florida PSC rules.

Further, that the information asserted to be highly sensitive confidential information (customer addresses, transport provisioning, and transport capacities), is "proprietary confidential business information" within the meaning of F.S. 364.183(3)(e).

That the highly sensitive confidential information specifically comprises "information relating to competitive interests, the disclosure of which would impair the competitive business" of SBCT.

That disclosure of this highly sensitive confidential information would provide competitors valuable information about the geographic scope of SBCT's operations and service offerings that is not publicly available.

That such disclosure would allow competitors to unfairly target SBCT's customers and operations.

That the highly sensitive confidential information is intended to be, and is treated by SBCT as, private and has not been disclosed to the public.

That the highly sensitive confidential information is held as confidential within the Company, with limited access to and distribution of the information.

That the information asserted to be highly sensitive confidential information is in fact bona fide proprietary confidential business information.

And finally that highly sensitive confidential information contained in said Response has been prepared and presented in accordance with all applicable Florida Statutes, Commission Rules, and Commission Orders.

Fred Goodwin  
Signature of Person Making Verification

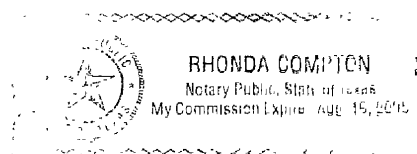
Assoc. Dir. - Regulation  
Job Title

2-25-04  
Date

Subscribed and sworn before me this the 25<sup>th</sup> day of February, 2004.

[Signature]  
Notary Public

My Commission Expires: \_\_\_\_\_



## AFFIDAVIT

By my signature below, I, Fred Goodwin, attest to the accuracy of the information contained herein and the attached documents. I have reviewed the foregoing and declare that, to the best of my knowledge and belief, the information is true and correct. I attest that I have the authority to sign on behalf of SBC Telecom, Inc. (SBCT).

**Further, I am aware that, pursuant to Chapter 837.06, Florida Statutes, "Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree, punishable as provided in s. 775.082 and s. 775.083."**

Fred Goodwin

Print Name

Fred Goodwin

Signature of Person Making Verification

Title: Associate Director-Regulatory

Date: February 25, 2004

Telephone No.: 210-246-8755

Fax No.: 210-246-8759

Utility: SBC Telecom, Inc.

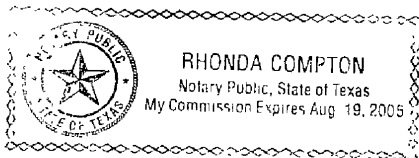
Address: 1010 N. St. Mary's, Room 1334, San Antonio, TX 78215

STATE OF TEXAS

COUNTY OF BEXAR

Sworn (or affirmed) and subscribed before me this 25<sup>th</sup> day of February, 2004, by

Rhonda Compton



(NOTARY SEAL)

(Signature of Notary Public)

(name of Notary, Typed, Printed, or Stamped)

Personally Known \_\_\_\_\_ OR Produced Identification \_\_\_\_\_ Type of Identification Produced \_\_\_\_\_