



Suzanne L. Montgomery
General Attorney - Florida

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5558
F: (305) 577-4491
sm6526@att.com

March 6, 2012

RECEIVED-FPSC
12 MAR - 6 PM 4:33
COMMISSION
CLERK

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

Re: Docket No. 110087-TP: Notice of the Adoption of existing interconnection, unbundling, resale, and collocation agreement between BellSouth Telecommunications, Inc. d/b/a AT& T Florida d/b/a AT&T Southeast and Image Access, Inc. d/b/a New Phone, Inc. by Express Phone Service, Inc.

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, LLC d/b/a AT&T Florida's Request for Specified Confidential Classification for its *Second Supplemental* response to Express Phone Service, Inc.'s First Request for Production of Documents, No.6, which we ask that you file in the captioned docket.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Suzanne L. Montgomery

cc: All Parties of Record
Gregory R. Follensbee

1020538

COM _____
APA _____
ECR _____
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK I-MM

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

For DN 00998-12, which is in locked storage. You must be authorized to view this DN.-CLK

DOCUMENT NUMBER-DATE

01317 MAR -6 12

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE
Docket No. 110087-TP

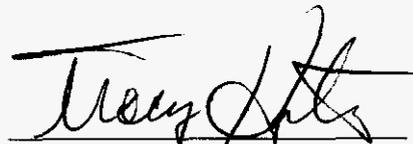
I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (*) Federal Express and First Class U.S. Mail this 6th day of March, 2012 to the following:

Lee Eng Tan
Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Express Phone Service
Mr. Tom Armstrong (+)(*)
1803 West Fairfield Drive, Unit 1
Pensacola, FL 32501-1040
Tel. No.: (850) 291-6415
Fax No.: (850) 308-1151
tom@dei.gccoxmail.com

Keefe Law Firm
Vicki Gordon Kaufman (+)(*)
118 North Gadsden Street
Tallahassee, FL 32301
Tel. No.: 850-681-3828
Fax No.: 850-681-8788
vkaufman@kaqmlaw.com
Atty. for Express Phone

Mark Foster
707 West Tenth Street
Austin, Texas 78701
Tel. No.: (512) 708-8700
Fax. No.: (512) 697-0058
mark@mfoosterlaw.com
Atty. for Express Phone



Suzanne L. Montgomery

(+) Signed Protective Agreement
916796

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Notice of the Adoption of existing) Docket No. 110087-TP
interconnection, unbundling, resale, and)
collocation agreement between BellSouth)
Telecommunications, Inc. d/b/a AT& T)
Florida d/b/a AT&T Southeast and Image)
Access, Inc. d/b/a New Phone, Inc. by Express)
Phone Service, Inc.)
_____) Filed: March 6, 2012

AT&T FLORIDA'S REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION

BellSouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T Florida"), pursuant to Rule 25-22.006, Florida Administrative Code, files its Request for Specified Confidential Classification.

1. On February 22, 2012, AT&T Florida served its *Second Supplemental* Response to Express Phone Service, Inc.'s ("Express Phone") First Request for Production of Documents No. 6, dated January 24, 2012.

2. AT&T Florida's *Second Supplemental* response to Express Phone's First Request for Production of Documents No. 6 consisted of three compact discs that contain billing records of Express Phone and thus contain customer- specific information that is considered confidential and proprietary by AT&T Florida and Express Phone. A more specific description of this information is contained in Attachment A.

3. The information discussed in the Request for Specified Confidential Classification is confidential to Express Phone and related to its competitive interests. Therefore, such information should be classified as confidential business information pursuant to Section 364.183, *Florida Statutes*. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, *Florida Statutes*.

4. Attachment A to AT&T Florida's Request for Confidential Classification contains an explanation of the proprietary information along with a list that identifies the location of the information designated as confidential.

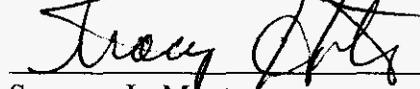
5. Because the information that AT&T Florida seeks to protect as confidential and proprietary pursuant to this Request for Confidential Classification are the entire contents of the three CDs which contain voluminous electronic billing records (all of which are confidential business information of Express Phone), AT&T Florida is unable to produce redacted or highlighted copies of the CDs. AT&T Florida will produce additional copies of the CDs upon the request of the Commission.

7. The original of this Request was filed today with the Office of the Commission Clerk and a copy was served on the Parties.

WHEREFORE, based on the foregoing, AT&T Florida respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted this 6th day of March, 2012.

AT&T FLORIDA



Suzanne L. Montgomery
Authorized House Counsel No. 94116
Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558
sm6526@att.com
th9467@att.com

ATTACHMENT A

**AT&T FLORIDA
FPSC DOCKET NO: 110087-TP
REQUEST FOR CONFIDENTIAL CLASSIFICATION
03/06/2012**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR
AT&T FLORIDA'S *SECOND SUPPLEMENTAL* RESPONSE TO EXPRESS PHONE
SERVICE, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6
IN DOCKET NO. 110087-TP**

Explanation of Proprietary Information

1. The attached information contains Express Phone's customer-specific billing data. The disclosure of this information to Express Phone's competitors is likely to give them an undue advantage and cause competitive harm to Express Phone. AT&T Florida treats this information as confidential information and protects it from disclosure. Therefore, this information constitutes proprietary confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes.

Location

Reason

CD-1 305Q926878
CD-2 561Q926878
CD-3 904Q926878

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