

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET NO. UT-030614
QWEST CORPORATION)	
)	Response of Advanced TelCom, Inc.
)	to Staff Motion for Clarification
For Competitive Classification of)	
Business Basic Exchange)	
Telecommunications Services)	

Advanced TelCom, Inc. dba Advanced TelCom Group (*ATG*) opposes Staff's Motion for Clarification, because that Motion requests a ruling that the aggregated information of competitive providers collected by Staff under Orders of this Commission constitutes non-confidential information. As the Commission recognized in its Order No. 8 in this proceeding:

The Commission is concerned that merely asking CLEC identities will not provide adequate protection, particularly when only one CLEC is active in a specific geographic area.

To the extent that, even when CLEC data is aggregated, there is *any* chance that disclosure of the data may lead to identification of the competitive provider providing the data, that data is necessarily highly confidential trade secret information of the CLEC.¹ The Commission plainly contemplated that there could be a problem with confidentiality even where data is aggregated. Rather than sorting through Staff's aggregated data and arguing about which data is or is not sufficiently confidential for particular geographic areas as the result of Staff's aggregation, the Commission should direct that all such data shall be treated as highly confidential.

¹ Even where there is more than one CLEC providing some service in a give geographic area, there may be only one CLEC which is providing facilities-based service, for example. Assuming that the data is disclosed by type of service, for that facilities-based carrier, it is a single carrier disclosure. Anyone with access to the Local Exchange Routing Guide could easily identify the CLEC and pore over its highly sensitive customer information in this docket.

WHEREFORE, Advanced TelCom, Inc. respectfully requests that such CLEC-
provided information, including Staff's aggregation thereof, be treated as highly confidential for
all purposes in this proceeding.

Dated: July 31, 2003.

Respectfully submitted,

ADVANCED TELCOM, INC.

By its attorney:

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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET NO. UT-030614
QWEST CORPORATION)	
For Competitive Classification of)	Certificate of Service of
Business Basic Exchange)	Response of Advanced TelCom, Inc.
Telecommunications Services)	to Staff Motion for Clarification

I hereby certify that I have this day served this document upon all parties of record on the attached list in this proceeding, by email, telefacsimile transmission, and first class mail with postage prepaid.

Dated at Santa Rosa, California, this 31st day of July, 2003.

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