



3065 Cumberland Circle  
Atlanta, GA 30339-3166

February 17, 1993

Mr. Steven C. Tribble, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Fletcher Building  
Tallahassee, Florida 32399-0870

Re: Docket No. 920260-TL - Comprehensive Review of the  
Revenue Requirements and Rate Stabilization Plan of  
Southern Bell Telephone and Telegraph Company

Dear Mr. Tribble:

Enclosed for filing in the above-referenced docket on behalf  
of Sprint Communications Company Limited Partnership are the  
original and fifteen (15) copies of Sprint's Request for  
Confidential Classification in the above-referenced matter. Please  
return a file-stamped copy in the enclosed self-addressed stamped  
envelope.

Very truly yours,

A handwritten signature in cursive script that reads "Chanthina R. Bryant".

Chanthina R. Bryant  
Attorney, State Regulatory

CRB:lj

Enclosure

cc: All Parties of Record

DOCUMENT NUMBER-DATE  
01929 FEB 18 88  
IN SC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Comprehensive Review of )  
the Revenue Requirements and Rate ) Docket No. 920260-TL  
Stabilization Plan of Southern )  
Bell Telephone & Telegraph Company ) Filed: February 18, 1993  

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**SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**  
**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Sprint Communications Company Limited Partnership ("Sprint"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its Request for Confidential Classification for its response to Items 1-4 of Staff's First Set of Interrogatories.

1. Sprint is filing its Request for Confidential Classification for its response to Interrogatory Nos. 1, 2, 3 and 4 because it deems the information requested as proprietary, confidential business information in that it is related to competitive interLATA and intraLATA toll services.

2. One copy of the answers for which confidential classification is requested is included in a sealed envelope attached hereto as Attachment A and labeled "CONFIDENTIAL". On this copy, the specific information for which confidentiality is requested has been highlighted. Copies of Attachment A are not being served on the other parties to this proceeding.

3. Two copies of the answers with the confidential information redacted are included in an envelope attached hereto as Attachment B. Copies of the redacted answers have been served on the parties of record as part of Sprint's Responses to Staff's First Set of Interrogatories.

DOCUMENT NUMBER-DATE

01929 FEB 18 88

FPSC-RECORDS/REPORTING

4. The highlighted information for which confidential classification is requested reflects Sprint's MTS-like traffic volumes (MOU) and revenues, broken down by time of day, mileage band and by business/residential usage, for both its interLATA and intraLATA services.

5. Both the interLATA and intraLATA toll markets are competitive arenas. The highlighted information discloses usage patterns and overall traffic volumes for different classes of Sprint's customers for one of Sprint's major toll services. Competitors of Sprint could use this information -- in combination with publicly available information on Sprint's prices and product offerings -- to analyze Sprint's customer base, to analyze the effectiveness of Sprint's marketing strategies, and to selectively target their own marketing efforts to respond to Sprint's revealed strengths and/or weaknesses in the marketplace. The disclosure of this competitive toll market information would impair Sprint's ability to compete effectively in the interLATA and intraLATA toll markets in Florida.

6. Section 364.183(3)(a),(e), Florida Statutes, expressly includes as proprietary confidential business information (i) trade secrets, and (ii) any information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. The information contained in Sprint's response to Interrogatory Nos. 1, 2, 3 and 4 meets both of these statutory criteria, as more fully described above, and is therefore entitled to confidential classification.

7. Sprint has treated and intends to continue to treat the material for which confidential classification is sought as private, and this information has not been publicly disclosed.

WHEREFORE, for the reasons stated above, Sprint moves the Prehearing Officer to enter an order:

(a) declaring that the information provided by Sprint in response to Interrogatory Nos. 1, 2, 3 and 4 of Staff's First Set of Interrogatories constitutes confidential proprietary business information of Sprint, and is not subject to public disclosure; and

(b) directing that the information be returned to Sprint at the conclusion of these proceedings.

RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of February, 1993.

SPRINT COMMUNICATIONS COMPANY  
LIMITED PARTNERSHIP

BY: Chanthina R. Bryant  
Chanthina R. Bryant  
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and

C. Everett Boyd, Jr.  
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the within and foregoing REQUEST FOR CONFIDENTIAL CLASSIFICATION in FPSC Docket No. 920260-TL; "COMPREHENSIVE REVIEW OF THE REVENUE REQUIREMENTS AND RATE STABILIZATION PLAN OF SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY" upon the following parties of record by depositing same in the United States Mail, first class, postage prepaid.

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This 17<sup>th</sup> day of February, 1993.

SPRINT COMMUNICATIONS COMPANY  
LIMITED PARTNERSHIP

By: Chanthina R. Bryant  
Chanthina R. Bryant  
Attorney, State Regulatory