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FILE COPY

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January 16, 1997

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 961230-TP


Dear Ms. Bayo:

Enclosed are the original and fifteen (15) copies of Sprint-Florida, Inc.'s Request for Confidential Classification.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,



J. Jeffrey Wahlen

- ACK cc: All Parties of Record
- AFA Enclosures
- APP
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN
- OPC
- WCH
- SEC
- WAS
- OTH

x-ref DN 13753-96
DOCUMENT NUMBER-DATE
00565 JAN 16 97
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI Telecommuni-)
cations Corporation for arbitration) DOCKET NO. 961230-TP
with United Telephone Company of) Filed: January 16, 1997
Florida and Central Telephone Company)
of Florida concerning interconnection)
rates, terms, and conditions,)
pursuant to the Federal Telecommuni-)
cations Act of 1996)
_____)

**SPRINT-FLORIDA, INC.'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Rule 25-22.006, Florida Administrative Code, SPRINT-FLORIDA, INC. (surviving entity after the merger of UNITED TELEPHONE COMPANY OF FLORIDA and CENTRAL TELEPHONE COMPANY OF FLORIDA) ("Sprint" or the "Company") files this Request for Specified Confidential Classification for certain cost study data information provided to the Staff as Late-filed Exhibit No. 23 in this docket, and say:

1. This request covers documents submitted to the Division of Records and Reporting under a confidential cover on December 27, 1996. These documents are identified as pages 346-350 and Late-Filed Exhibit No. 23 to the direct testimony of Randy G. Farrar. This **confidential** exhibit contains certain cost data prepared by Sprint. The documents to which this request relates were filed with the Division of Records and Reporting under a separate confidential cover and a Notice of Intent to Request Confidential Classification on December 27, 1996.

DOCUMENT NUMBER-DATE

00565 JAN 16 97

FPSC-RECORDS/REPORTING

2. In accordance with FPSC Rule No. 25-22.006, F.A.C., a copy of the documents with the information the Companies consider to be proprietary has been filed under a separate cover as Exhibit "A" to this request and has the confidential information highlighted for identification purposes. In accordance with Rule 25-22.006, Florida Administrative Code, the Companies have appended hereto as Exhibit "B" one edited copy of the confidential documents with the confidential information blacked out ("redacted").

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on the Companies or its ratepayers will result from the disclosure of the information to the public. The Companies have identified this confidential information on a line-by-line basis, and have appended the required line-by-line identification and justifications hereto as Exhibit "C."


4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

7. For all the foregoing reasons, Sprint respectfully urges the Commission to classify the above-described and discussed documents as proprietary confidential business information pursuant

to Rule 25-22.006, Florida Administrative Code, and as such exempt from Chapter 119, Florida Statutes.

WHEREFORE, SPRINT moves the Commission to enter an Order declaring the documents claimed to be confidential in this request are proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 16th day of January, 1997.



LEE L. WILLIAMS
JOHN P. FONS AND
J. JEFFRY WAHLEN
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P. O. Box 391
Tallahassee, Florida 32302
(904) 224-9115


ATTORNEYS FOR SPRINT-FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this 16th day of January, 1997, to the following:

Martha Brown *
Cochran Keating
Charlie Pellegrini
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Richard D. Melson *
Hopping Green Sams & Smith
123 S. Calhoun Street
Tallahassee, FL 32301



Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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EXHIBIT "B" TO SPRINT'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Unedited Version
With
Confidential Information Redacted

43. Referring to Composite Exhibit No. RGF-3, page 122:

- (a) Please provide the detailed derivations of each of the maintenance factors shown on this exhibit, identifying the source of all data used in the derivations.

Supplemental Response:

- (a) Attached are the worksheets showing the derivation of the maintenance factors identified on Composite Exhibit No. RGF-3, page 122. The calculations are based on 1994 Year End General Ledger balances for the combined Central and United (Florida) companies.

Sheet 1 shows the worksheet which was used in error to calculate a revised maintenance factor based on removing software expense from the maintenance expense total. In fact, this sheet was a 1992 worksheet misfiled in the 1994 folder. Sheet 2 is a 1992 summary worksheet which shows the maintenance factors from sheet 1.

Sheet 3 identifies the maintenance and investment account balances and the correct maintenance factors for all elements except digital switching which is calculated on sheet 4. Please note that with the exception of the Digital Switch factor, all elements agree with Exhibit No. RGF-3, page 122. The correct Digital Switch Factor is .044755 as calculated on sheet 4 rather than the .033392.

MAINTENANCE FACTOR - Expenses / Average Plant In Service

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	A	B	C	D	E
Aerial Cable Metallic	6421.1	2421.1	(0.04578 1
Aerial Cable Fiber Optic	6421.2	2421.2	(0.005809 2
Aerial Cable Metallic Drop	6421.6	2421.6	(0.154176 3
Underground Cable Metallic	6422.1	2422.1	(0.020389 4
Underground Cable Fiber Optic	6422.2	2422.2	(0.003003 5
Buried Cable Metallic	6423.1	2423.1	(0.043739 6
Buried Cable Fiber Optic	6423.2	2423.2	(0.005228 7
Buried Cable Metallic Drop	6423.6	2423.6	(0.118387 8
Buried Cable Fiber Optic Drop	6423.7	2423.7	(N/A 9
Intrabldg. Network Cable Metallic	6426.1	2426.1	(0.005051 10
Intrabldg. Network Cable Fiber Optic	6426.2	2426.2	(0.002527 11
Pole Lines	6411	2411	(0.013398 12
Conduit Systems	6441	2441	(0.005103 13
**Digital Electronic Switch-DSS 1210	6212	2212	(0.103143 14
**Digital Electronic Switch-Other	6212	2212	(0.059862 15
Circuit Equipment Analog	6232.1	2232.1	(0.084972 16
Circuit Equipment Analog Pair Gain	6232.4	2232.4	(0.034205 18
Circuit Equipment Digital - Metallic	6232.2	2232.2	(0.028845 19
Circuit Equipment Digital - Metallic - PG	6232.5	2232.5	(0.023074 20
Circuit Equipment Digital - Fiber Optic	6232.3	2232.3	(0.007102 21
Public Tel. Eqpt. *	6351	2351	(0.507846 22
Land and Buildings	6121	2121	(0.104617 23
Operator Systems	6220	2220	(0.019826 24

6212 710
 430
 960
 SOPHIA
 Exp: 2232.1

**Digital Electronic Switch-Using 1992 data.
 Will update as soon as info is available.

* Public Telephone Equipment includes Commissions and Collections expenses.
 These are accounts are 6623.7 and 6823.05 respectively.

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 Late-Filed Exhibit No. 23
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	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
CLASSES OF CABLE (ACCOUNTS 2411 - 2417)	Obj. Rate (A)	Obj. Factor (B)	Obj. Rate (C)	Obj. Rate (D)	Obj. Rate (E)	Obj. Rate (F)	Obj. Rate (G)	Obj. Rate (H)	Obj. Rate (I)
Aerial Cable - Metallic	0.1125	1.5815	0.1757	0.441483	0.077665	0.053	0.058053	0.0185	0.205706
Aerial Cable - Fiber Optic	0.1125	1.5816	0.1757	0.682354	0.110808	0.053	0.107841	0.0185	0.209208
Aerial Cable - Metallic Drop	0.1125	1.5815	0.1757	0.820721	0.144175	0.053	0.184100	0.0185	0.300644
Uground Cable - Metallic	0.1125	1.5815	0.1757	0.438367	0.077008	0.042	0.020005	0.0185	0.187511
Uground Cable - Fiber Optic	0.1125	1.5815	0.1757	0.825581	0.145029	0.055	0.003943	0.0185	0.227472
Buried Cable - Metallic	0.1125	1.5815	0.1757	0.812457	0.107590	0.058	0.046948	0.0185	0.232038
Buried Cable - Fiber Optic	0.1125	1.5815	0.1757	0.844329	0.148322	0.053	0.004744	0.0185	0.227606
Buried Cable - Metallic Drop	0.1125	1.5816	0.1757	0.730871	0.128391	0.059	0.128170	0.0185	0.332381
Buried Cable - Fiber Optic Drop	0.1125	1.5815	0.1757	N/A	0.000000	0.053	N/A	0.0185	N/A
Intrabuilding Network Cable - Metallic	0.1125	1.5815	0.1757	0.688231	0.120549	0.072	0.006042	0.0185	0.237091
Intrabuilding Network Cable - Fiber Optic	0.1125	1.5815	0.1757	0.861868	0.168835	0.053	N/A	0.0185	N/A
Pole Lines	0.1125	1.5815	0.1757	0.501512	0.088118	0.076	0.041533	0.0185	0.224141
Conduit Systems	0.1125	1.5815	0.1757	0.722088	0.127008	0.021	0.004728	0.0185	0.171232
DIGITAL ELECTRONIC SWITCH (ACCOUNT 2212)									
Digital Electronic Switch - DSS 1210	0.1125	1.5815	0.1757	0.688289	0.121083	0.108	0.03143	0.0185	0.350728
Digital Electronic Switch - Other	0.1125	1.5815	0.1757	0.688289	0.121083	0.053	0.068082	0.0185	0.282216
CIRCUIT EQUIPMENT (ACCOUNT 2232)									
Circuit Equipment Analog	0.1125	1.5815	0.1757	0.387884	0.088100	0.140	0.080996	0.0185	0.307596
Circuit Equipment Analog - Pair Gain	0.1125	1.5815	0.1757	0.640763	0.112582	0.140	0.017988	0.0185	0.289050
Circuit Equipment Digital - Metallic	0.1125	1.5815	0.1757	0.414194	0.072781	0.073	0.028092	0.0185	0.187253
Circuit Equipment Digital - Metallic PG	0.1125	1.5815	0.1757	0.427354	0.075073	0.073	0.024291	0.0185	0.180864
Circuit Equipment Digital - Fiber Optic	0.1125	1.5815	0.1757	0.588428	0.100030	0.143	0.007289	0.0185	0.288700
Public Telephone Equipment	0.1125	1.5815	0.1757	0.308711	0.054231	0.100	0.582449	0.0185	0.765180
Land & Buildings	0.1125	1.5815	0.1757	0.703888	0.123851	0.042	0.101832	0.0185	0.285983
Operator Systems	0.1125	1.5815	0.1757	0.250324	0.043074	0.100	0.002057	0.0185	0.185431

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SPRINT FLORIDA - COMBINED COMPANIES: Maintenance Factors				1994 YEAR-END BALANCES	
	A	B	C	D	E
Category	Maintenance A/C	Investment A/C	Maintenance \$	Investment \$	Maint. Factor
Switching	6212	2212	NOTE: See Separate Worksheet		0.044754588
Circuit Eqpt Dig.	6232.2	2232.2	[REDACTED]		0.025394738
Buried Cable Met.	6423.1	2423.1	[REDACTED]		0.052998605
Aerial Cable Met.	6421.1	2421.1	[REDACTED]		0.091363444
Underground Fiber	6422.2	2422.2	[REDACTED]		0.005725483
Buried Fiber Drop	6423.7	2423.7	NOTE: Included with Burled Fiber		0.005237621
Buried Met. Drop	6423.6	2423.6	[REDACTED]		0.099978286
Buried Fiber	6423.2	2423.2	[REDACTED]		0.005237621
Underground Met.	6422.1	2422.1	[REDACTED]		0.031292871
Aerial Cbl Met Drop	6421.6	2421.6	[REDACTED]		0.140192696
Circuit Eqpt Fiber	6232.3	2232.3	[REDACTED]		0.0079165
Aerial Fiber	6421.2	2421.2	[REDACTED]		0.008472536
Conduit	6441	2441	[REDACTED]		0.003796851
Poles	6411	2411	[REDACTED]		0.314630441

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Docket No. 961230-TP
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A	B	C	D	E	F
	Investment/ Maintenance	S/UT-F	S/UT-F	Combined	Combined
Switch Category	C Alloc. Factors	Investment Dollars	Maintenance Dollars	Investment Dollars	Maintenance Dollars
	Investment				
1210	0.155234	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other	0.844766	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	Maintenance		With Software Expense		
1210	0.241091	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other	0.758909	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
			W/O Software Expense		
1210		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Other		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
MAINTENANCE FACTORS:					
			With Software Expense		
1210			.08230178		0.082301781
Other			.04760673		0.068954564
			W/O Software Expense		
1210			.08230178		0.082301781
Other			.03154765		[REDACTED]

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EXHIBIT "C" TO SPRINT'S
 REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Identification and Justification

Number	Line(s)	Column(s)	Justification
347	1-24	C,D	Note 1
349	1-5, 7-14	C,D	Note 1
350	1-9	C-F	Note 1

Note 1: The amounts on these pages show investment and expenses subdivided to specific network elements and accounts. This information is not available to this level of detail in any public document. This type of data shows fundamental information about the economics of operating the Companies and would be useful to competitors when making economic decisions such as whether, where and when to compete. Sprint does not have and cannot get this type of information for its competitors. Disclosing this information to the public, when such information is not available from competitors, would put Sprint at a competitive disadvantage in the marketplace, thereby harming Sprint.