

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Mailstop FLTLH00107
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

February 4, 2003

Ms. Blanca Bayo', Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: Docket Nos. 981834 & 990321-TP

Dear Ms. Bayo':

Enclosed for filing are the original and 15 copies of the following:

1. Direct Testimony of Jimmy R. Davis 01148-03
2. Direct Testimony of Edward Fox, including Exhibits EBF-1 & EBF-2 01149-03
3. Sprint's Request for Confidential Classification 01150-03

In addition, pursuant to staff's direction, Sprint is filing the following:

4. Two redacted hard copies of Exhibit JRD-2 and one CD-ROM containing the redacted Exhibit JRD-2. 01151-03

Hard copies and CD-ROMs containing the nonredacted version of Exhibit JRD-2 (Collocation Cost Study) are being transmitted separately under seal this same day. Copies are being served on the parties in this docket, pursuant to the attached Certificate of Service. Parties that have executed a nondisclosure agreement will receive nonredacted versions of Exhibit JRD-2. All other parties will receive redacted versions.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

RECEIVED - FPSC
03 FEB - 4 PM 4:50
COMMISSION
CLERK

Sincerely,

Susan S. Masterton

Susan S. Masterton

Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

CERTIFICATE OF SERVICE
DOCKET NO. 981834-TP & 990321-TP

I HEREBY CERTIFY that a true and correct copy of the Redacted or Non-redacted+ Exhibit JRD-2 (Collocation Cost Study) was served by U.S. Mail or Hand Delivery* this 4th day of February, 2003 to the following:

Wayne Knight, Esq.* +
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications, Inc.
150 S. Monroe Street Suite 400
Tallahassee, Florida 32301-1556

Alltel Communications Services, Inc.
Bettye Willis
One Allied Drive
Little Rock, AR 72203-2177

Hopping Law Firm
Rick Melson
Post Office Box 6526
Tallahassee, Florida 32314

Pennington Law Firm
Peter Dunbar/Marc W. Dunbar
Post Office Box 1009
Tallahassee, Florida 32302

Florida Cable Telecommunications
Association, Incorporated
Michael A. Gross
310 North Monroe Street
Tallahassee, Florida 32301

Time Warner Telecom
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

FCCA
c/o McWhirter Law Firm
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, Florida 32301

Ausley Law Firm
Jeff Wahlen
Post Office Box 391
Tallahassee, Florida 32302

MCI WorldCom Communications, Inc.
Donna McNulty
1203 Governors Square Blvd. Suite 201
Tallahassee, Florida 32301-2960

Messer Law Firm
Floyd Self/Norman Horton
Post Office Box 1876
Tallahassee, Florida 32302

MediaOne Florida Telecommunications,
Inc.
c/o Laura L. Gallagher, P.A.
101 E. College Ave., Suite 302
Tallahassee, Florida 32301

AT&T Communications of the
Southern States, Inc.
Tracy W. Hatch +
1200 Peachtree Street, NE Suite 8100
Atlanta, GA 30309

Florida Digital Network, Inc.
Matthew Feil, Esq.
390 North Orange Ave., Suite 2000
Orlando, FL 32801

Katz, Kutter Law Firm
Charles Pellegrini/Patrick Wiggins
12th Floor
106 East College Avenue
Tallahassee, Florida 32301

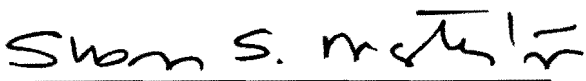
Supra Telecommunications &
Information Systems, Inc.
Mark E. Buechele
2620 S.W. 27th Avenue
Miami, FL 33133

Verizon-Florida, Incorporated
Michelle Robinson
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

ITC^DeltaCom Communications, Inc.
Nanette Edwards
Messer, Caparello & Self
Post Office Box 1876
Tallahassee, Florida 32302-1876

Network Telephone Corporation
Brent E. McMahan
815 South Palafox Street
Pensacola, FL 32501-5937

KMC Telecom, Inc.
Mr. John D. McLaughlin, Jr.
1755 North Brown Road
Lawrenceville, GA 30043-8119


Susan S. Masterton

+ Non-redacted copies will be provided up execution of the appropriate non-disclosure agreement.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for
Commission action to support local
competition in BellSouth
Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications,
Inc., Sprint-Florida, Incorporated, and GTE
Florida Incorporated comply with obligation to
provide alternative local exchange carriers
with flexible, timely, and cost-efficient
physical collocation.

DOCKET NO. 990321-TP

Filed: February 4, 2003

Sprint's Request for Confidential Classification Pursuant to
Section 364.183(1), Florida Statutes

Sprint-Florida, Incorporated (hereinafter "Sprint") hereby requests that the Florida Public Service Commission ("Commission") classify certain documents and/or records identified herein as confidential, exempt from public disclosure under Chapter 119, Florida Statutes and issue any appropriate protective order reflecting such a decision. The information that is the subject of this request is vendor specific pricing information or information from which such information can be derived. The information has been filed, under seal, with the Division of Records and Reporting.

1. The following documents or excerpts from documents are the subject of this request:

Highlighted portions of pages 75, 77, 78, 79, 80, 82, and 107 of Sprint's Collocation Cost Study, designated as Exhibit JRD-2 to Jimmy R. Davis's Direct Testimony

DOCUMENT NUMBER-DATE

01150 FEB-4 03

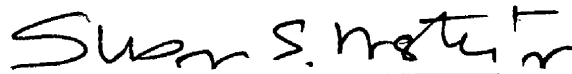
FPSC-COMMISSION CLERK

2. Eight (8) unredacted hard copies of the documents and three (3) unredacted CD ROMs containing the information have been submitted to the Division of Records and Reporting, pursuant to staff's direction, under seal this same day. The confidential information is identified by gray highlighting. Two (2) redacted hard copies and one (1) redacted CD ROM have also been filed with Division of Records and Reporting coincident with the filing of this request.
3. The information for which the Request is submitted is vendor specific pricing information, or information from which such information can be derived, and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(d), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment A.
4. Section 364.183(3), F.S., provides:
 - (3) The term "proprietary confidential business information" means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. The term includes, but is not limited to:
 - (a) Trade Secrets.
 - (b) Internal auditing controls and reports of internal auditors.
 - (c) Security measures, systems, or procedures.
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.

- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.
5. The subject information has not been publicly released. Furthermore, release of the information could impair the efforts of the company or its affiliates to contract for goods and services on favorable terms and could impair the competitive business interests of Sprint.
6. The commission has previously found information similar in character to be confidential. See, *In Re: Investigation into Pricing Unbundled Network Elements*, Docket No. 990649B-TP, Order No. PSC-02-0451-CFO-TP.

Based on the foregoing, Sprint respectfully requests that the Commission grant the Request for Confidential Classification, exempt the information from disclosure under Chapter 119, Florida Statutes and issue any appropriate protective order, protecting the information from disclosure while it is maintained at the Commission.

RESPECTFULLY SUBMITTED this 4th day of February 2003.



Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560

ATTORNEY FOR SPRINT

ATTACHMENT A

Page and line numbers of Exhibit JRD-2	Justification for Confidential Treatment
Page 75, lines 1-9 & 15, columns 4-9	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 77, lines 3 & 4 columns 4-9	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 78, lines 3-7, columns 4-9	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 79, lines 3-5, columns 4-9	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 80, lines 2-6 & 8, columns 7-9	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would

	compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 82, lines 3, 6-9 & 17, columns 4-9	Contains Sprint-Florida vendor specific information, or information from which such information can be derived. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Page 107, lines 17-33, columns 2 & 3	Contains Sprint-Florida vendor specific pricing information, or information from which such information can be derived, which Sprint-Florida is required by the terms of the vendor contracts to keep confidential. Allowing competitors access to this information would compromise Sprint-Florida's relationship with the vendors, would adversely impact Sprint-Florida's ability to contract on favorable terms and would unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.