

ORIGINAL



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August 20, 2003

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

RECEIVED-FPSC
03 AUG 20 PM 4:50
COMMISSION
CLERK

RE: Docket No. 030296-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and fifteen copies of Sprint's Request for Confidential Classification pursuant to Section 364.183(1), Florida Statutes.

Copies are being served on the parties in this docket pursuant to the attached Certificate of Service.

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.

Sincerely,

Susan S. Masterton

Enclosures

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

cc: conf records

This confidentiality request was filed by or for a "telco" for DN 06922-03. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER - DATE

07737 AUG 20 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Communications of the) Southern States, LLC and TCG South Florida) For Arbitration of Certain Terms And Conditions) Of A Proposed Interconnection Agreement with) Sprint- Florida, Incorporated pursuant to 47 U.S.C.) Section 252))	Docket No. 030296-TP Filed: August 20, 2003
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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. Sprint previously filed a Notice of Intent to Request Confidential Classification on July 30, 2003 for this information and now files this Request for Confidential Classification pursuant to the requirements of Rule 25-22.006, F.A.C.

The information that is the subject of this request is information relating to the competitive interests of Sprint or Sprint's wholesale customers. The information was filed on July 30, 2003, under seal, with the Division of Records and Reporting.

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

- Attachment 1 to Sprint's Response to Interrogatory No. 3**
- Attachment 2 to Sprint's Response to Interrogatory No. 9**
- Highlighted information in Sprint's Response to Interrogatory No. 18**
- Highlighted information in Sprint's Response to Interrogatory No. 21**

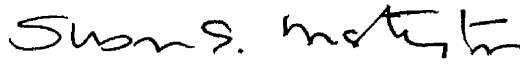
2. Two redacted copies of the Responses to Interrogatory No. 18 and Interrogatory No. 21 are attached to this request. Redacted copies of Attachment 1 to Interrogatory No. 3 and Attachment 2 to Interrogatory No. 9 are not included, as Sprint is requesting confidential classification for the entire documents. One highlighted and/or unredacted copy of the confidential information was filed under seal with the Division of Records and Reporting on July 30, 2003.
3. The information for which the Request is submitted is information relating to the competitive interests of Sprint or Sprint's wholesale customers, the disclosure of which would impair Sprint's or its wholesale customers' competitive business. 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 Sprint's or its wholesale customers' competitive business interests.

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 20th day of August 2003.



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

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Attachment 1 to Sprint's Response to Interrogatory No. 3 (entire document)	Contains competitively sensitive information relating to the location of Sprint's wholesale customer's (AT&T's) POIs, disclosure of which will impair AT&T's competitive business interests.
Attachment 2 to Sprint's Response to Interrogatory No. 9 (entire document)	Contains competitively sensitive information relating to Sprint's and its wholesale customers' (other ILECs') deployment of facilities, disclosure of which will impair Sprint's and its wholesale customers' competitive business interests.
Highlighted information in Sprint's Response to Interrogatory No. 18	Contains competitively sensitive information relating to Sprint's and its wholesale customer's (AT&T's) exchange of traffic, disclosure of which will impair Sprint's and AT&T's competitive business interests.
Highlighted information in Sprint's Response to Interrogatory No. 21	Contains competitively sensitive information relating to Sprint's and its customer's (AT&T's) exchange of traffic, disclosure of which will impair Sprint's and AT&T's competitive business interests.

SPRINT
DOCKET NO. 030296-TP
STAFF'S FIRST SET
INTERROGATORY NO. 18

18. Please refer to the direct testimony of AT&T witness David Talbott, page 66, lines 3-5, where he argues that Sprint's allegations regarding IP transport technology are generic rather than specific to Sprint's dispute with AT&T. Please also refer to the direct testimony of Sprint witness James Burt, page 3, lines 18-21, where he states that Sprint is losing significant access revenue from AT&T for Phone-to-Phone VoIP traffic.
- (a) To show the significance of the revenue lost, please provide, by year, for the most recently available three years, the amount of revenue lost from AT&T due to its use of VoIP. Express in both dollar amount and percent of total revenue received from AT&T.
 - (b) If Sprint were to reduce its intrastate switched access charges to parity with its interstate switched access charges as of January 1, 2003, what would be the impact on the revenue losses identified in response to (a)? Please be specific in terms of the dollar impact.
 - (c) Under the scenario in (b), does Sprint believe such a reduction would provide a disincentive to long distance carriers to switch to VoIP for voice traffic? Why or why not?

Answer:

- (a) In James Burt Direct Testimony, page 4, line 10-11, the cost per minute of use for traffic terminated over local interconnection trunks was identified as \$0.007. Since the Direct Testimony was filed it was discovered the rate per minute of use should have been \$0.001. Sprint sent AT&T a letter stating that Sprint had opted in to the FCC ISP bound reciprocal compensation rate on January 24, 2002. This letter stated that if AT&T did not respond or object to the rate it would go into effect. AT&T did not respond to Sprint's letter so the rate of \$0.001 should have been in effect but it was not implemented in Sprint's billing system

until July of 2003. Using the correct rate of \$0.001 per minute of use, the revenue lost for the period from August 2002 through December 2002 is \$ [REDACTED] . This represents [REDACTED] % of Sprint's total Florida terminating switched access revenue received from AT&T for the same period. The revenue lost for the period from January 2003 through May of 2003 is \$ [REDACTED] . This represents [REDACTED] % of Sprint's total Florida terminating switched access revenue received from AT&T for the same period.

(b) If intrastate rates were at parity with interstate rates, the access revenue loss for the January through May 2003 time period would be \$ [REDACTED] or [REDACTED] % of Sprint's total Florida terminating switched access revenue received from AT&T for the same period.

(c) No. VoIP is the technology that will be adopted by virtually all carriers over time. The reduction in the difference between access and reciprocal compensation rates may reduce the incentive to avoid paying access by terminating toll traffic over local interconnection trunks. However, since Sprint has "opted in" to the lower reciprocal compensation rate the difference between the interstate switched access rates and reciprocal compensation rates still provides an incentive to avoid paying access.

SPRINT
DOCKET NO. 030296-TP
STAFF'S FIRST SET
INTERROGATORY NO. 21

21. Please refer to the direct testimony of Sprint witness Burt, page 13, lines 19-21, where he states that "Sprint has determined that a significant amount of the traffic delivered to Sprint over local interconnection trunks is toll traffic."
- (a) Does that sentence refer only to traffic delivered by AT&T or to traffic delivered by other carriers as well?
 - (b) Please provide the percentage of traffic delivered to Sprint over local interconnection trunks that is toll traffic.

Answer:

- (a) Although Sprint suspects other carriers are utilizing VoIP as a way to avoid paying access charges, the statement refers to AT&T.
- (b) For the August 2002 through May 2003 time period, to the best of Sprint's measurement ability, the percentage of traffic delivered over AT&T local interconnection trunks that is toll traffic is ■ %.

**CERTIFICATE OF SERVICE
DOCKET NO. 030296-TP**

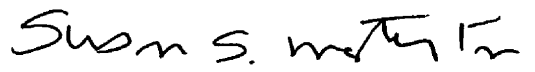
I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail and U.S. Mail this 20th day of August, 2003 to the following:

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& TCG South Florida
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