

ORIGINAL
AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

September 8, 2003

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission
Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

RECEIVED FPSC
SEP - 8 PM 4:06
COMMISSION
CLERK

Re: Docket No. 030296-TP

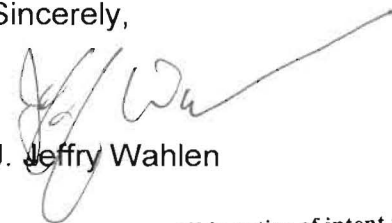
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint's Notice of Intent to Request Confidential Classification. The original document for which Sprint will be requesting confidential classification is included in a sealed envelope marked Attachment Two; however, copies of Attachment Two are not included in the fifteen (15) filing copies or the copies of this that are served on the parties of record.

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

Enclosures

cc: All Parties of Record (without Attachment Two)

h:\jjw\sprint\030296\bayo noi ans int.doc

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL 1
- OPC _____
- MSIS _____
- SEC 1
- OTH _____

cc:
Comp
records

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 08442-03. The confidential material is in locked storage pending staff advice on handling.

DOCUMENT NUMBER-DATE
08441 SEP-8 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved)
issues resulting from negotiations with)
Sprint-Florida, Incorporated for interconnection)
agreement, by AT&T Communications of the)
Southern States, LLC d/b/a AT&T and TCG))
South Florida)

DOCKET NO. 030296-TP
FILED: September 8, 2003

**SPRINT-FLORIDA, INCORPORATED'S NOTICE OF INTENT
TO REQUEST CONFIDENTIAL CLASSIFICATION**

Sprint-Florida, Incorporated ("Sprint") pursuant to Rule 25-22.006, Florida Administrative Code, files this Notice of Intent to Request Confidential Classification and says:

1. On August 22, 2003, Staff served its Third Set of Interrogatories on Sprint, a copy of which is attached as Attachment One. Sprint is providing its answers on this date.
2. The information contained in Sprint's Answers includes the following confidential and proprietary information:

Highlighted information in Sprint's Answer to Interrogatory No. 36
3. A copy of Sprint's Answer to Interrogatory No. 36 with the information asserted to be confidential highlighted is included in the attached envelope as Attachment Two.
4. In order to allow the Commission staff to take possession of this confidential information without delay, Sprint is now filing this Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a). Sprint intends to

DOCUMENT NUMBER-DATE
08441 SEP-8 8
FPSC-COMMISSION CLERK

subsequently file a Specific Request for Confidential Classification in accordance with the rule.

5. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record without Attachment Two. Attachment Two will be sent to counsel for AT&T in accordance with the non-disclosure agreement between the parties.


DATED this 8th day of September, 2003.

SUSAN MASTERTON
P. O. Box 2214
1313 Blairstone Road
Tallahassee, Florida 32316
Mailstop FLTLH00107
(850) 599-1560
susan.masterton@mail.sprint.com

and

KENNETH SCHIFMAN
6450 Sprint Parkway
Mail Stop: KSOPHTO101-Z2060
Overland Park, KS 66251
Kenneth.Schifman@mail.sprint.com

and



J. JEFFRY WAHLEN
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
(850) 224-9115
jwahlen@ausley.com

ATTORNEYS FOR SPRINT

CERTIFICATE OF SERVICE

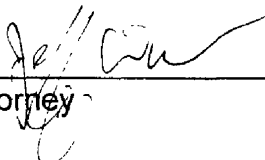
I HEREBY CERTIFY that a true copy of the foregoing has been furnished by
U. S. Mail or hand delivery (*) this 8th day of September, 2003, to the following:

Linda Dodson *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

AT&T
Ms. Lisa A. Riley
1200 Peachtree Street, N.E., Ste. 8026
Atlanta, GA 30309-3523

Tracy Hatch *
AT& T Communications of the
Southern States, LLC
101 North Monroe Street, Suite 700
Tallahassee, FL 32301

Womble Carlyle Law Firm
Loretta A. Cecil, Esquire
1201 West Peachtree Street
Suite 3500
Atlanta, GA 30309



Attorney

h:\jw\sprint\030296\noi staff3dirr.doc

Doc 9-8-03

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved issues resulting from negotiations with Sprint-Florida, Incorporated for interconnection agreement, by AT&T Communications of the Southern States, LLC d/b/a AT&T and TCG South Florida.

DOCKET NO. 030296-TP
FILED: AUGUST 22, 2003

STAFF'S THIRD SET OF INTERROGATORIES (NOS. 20-21)
TO AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC d/b/a AT&T

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves its Third Set of Interrogatories (Nos. 20 through 21) to AT&T Communications of the Southern States, LLC d/b/a AT&T. These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure and within the time period set out in Order No. PSC-03-0692-PCO-TP, which states:

- (a) All discovery requests shall be served by e-mail or fax, as well as by overnight mail;
- (b) Discovery responses shall be served within 15 business days of receipt of the discovery request;

ATTACHMENT ONE

- (c) There shall be no extra time for mailing throughout this proceeding; and
- (d) All discovery requests and responses shall also be served on staff.

Provide the name, address and relationship to the Company of each person providing answers to the following inquiries and identify which question(s) each person answered.

DEFINITIONS

"You", "your", "Company" or "AT&T" refers to AT&T Communications Of the Southern States, LLC d/b/a AT&T, its employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

"Identify" means:

- (a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Company;

STAFF'S THIRD SET OF INTERROGATORIES (NOS. 20-21) TO AT&T
COMMUNICATIONS OF THE SOUTHERN STATES, LLC d/b/a AT&T
DOCKET NO. 030296-TP
PAGE 3

(b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

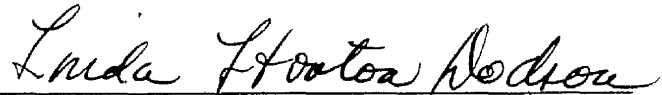
"Act" refers to the Communications Act of 1934 as amended by the Telecommunications Act of 1996.

STAFF'S THIRD SET OF INTERROGATORIES (NOS. 20-21) TO AT&T
COMMUNICATIONS OF THE SOUTHERN STATES, LLC d/b/a AT&T
DOCKET NO. 030296-TP
PAGE 4

INTERROGATORIES:

20. Does AT&T deliver toll traffic via local trunks to Sprint using VoIP?

21. Does AT&T deliver toll traffic via local trunks to Sprint using any technologies other than VoIP and traditional switched access?



LINDA HORTON DODSON
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of unresolved issues resulting from negotiations with Sprint-Florida, Incorporated for interconnection agreement, by AT&T Communications of the Southern States, LLC d/b/a AT&T and TCG South Florida.

DOCKET NO. 030296-TP
FILED: AUGUST 22, 2003

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that one true and correct copy of Third Set of Interrogatories (Nos. 20 through 21), has been served VIA-Overnight Mail and Electronic Mail upon Loretta A. Cecil, Esq., Womble Carlyle Law Firm (GA), 1201 West Peachtree Street, Suite 3500, Atlanta, Georgia, 30309 on behalf of AT&T Communications of the Southern States, LLC d/b/a AT&T, this 22nd day of August, 2003, and by U.S. Mail to the following:

AT&T
Ms. Lisa A. Riley
1200 Peachtree St, N.E., Ste.
8026
Atlanta, GA 30309-3579

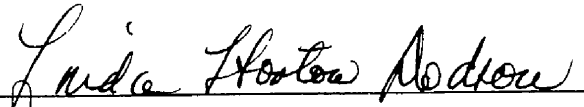
Sprint (KS)
Kenneth Schifman
6450 Sprint Parkway
Mail Stop: KSOPHT0101-Z2060
Overland Park, KS 66251

Sprint-Florida, Incorporated
F. B. (Ben) Poag/
Susan Masterton
(MC FLTLHO0107)
P. O. Box 2214
Tallahassee, FL 32316-2214

AT&T
Tracy Hatch
101 North Monroe Street
Suite 700
Tallahassee, Florida 32301

CERTIFICATE OF SERVICE
DOCKET NO. 030296-TP
PAGE 2

J. Jeffry Wahlen
Ausley Law Firm
P.O. Box 391
Tallahassee, Florida 32301

A handwritten signature in cursive script that reads "Linda Horton Dodson". The signature is written in black ink and is positioned above a horizontal line.

LINDA HORTON DODSON
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(850) 413-6199