

ORIGINAL  
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September 18, 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  
03 SEP 18 AM 11:40  
COMMISSION  
CLERK

Re: Docket No. 030296-TP

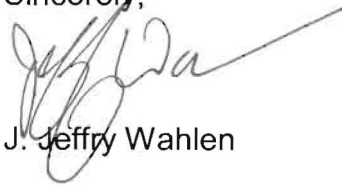
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the Sprint-Florida, Incorporated'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

Enclosures

cc: All Parties of Record

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AUS  
CAF  
LMP  
POM  
PTR  
SCR  
SCL  
CPC  
MMS  
SEC  
OTH

cc:  
cont  
records

This confidentiality request was filed by or for a "telco" for DNO 08902-03. 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.  
(x-ref. 08442-03)

DOCUMENT NUMBER-DATE

08901 SEP 18 3

FPSC-COMMISSION CLERK

# ORIGINAL

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

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DOCKET NO. 030296-TP  
FILED: September 18, 2003

## **SPRINT-FLORIDA, INCORPORATED'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

SPRINT-FLORIDA, INCORPORATED ("Sprint" or the "Company"), pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. Sprint is a telecommunications company that does business in Florida. Sprint is the Respondent in this docket.

2. On September 8, the Company filed the confidential version of its Answers to Staff's Third Set of Interrogatories with the Division of Commission Clerk and Administrative Services ("Clerk), together with a Notice of Intent to Request Confidential Classification for portions of those answers. Therein, the Company asserted that certain information therein was confidential and designated the confidential information by highlighting it with a yellow marker. The Company's confidential filing was assigned Document Number 08442-03. A non-confidential version (redacted) of the answers was contemporaneously delivered to the Clerk and served on the parties.

3. In accordance with the procedures set forth in Section 25-22.006(4), Florida Administrative Code, the Company asserts that the highlighted information in its

DOCUMENT NUMBER-DATE

08901 SEP 18 3

FPSC-COMMISSION CLERK

Answers is "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes, and requests that the Commission keep that information confidential and exempt from public disclosure in accordance with Section 25022.006(4), Florida Administrative Code.

4. Two edited versions of the Answers with the confidential information redacted are attached as Exhibit "A". Another copy of the Answers with the Confidential information highlighted in included as Exhibit "B". The line-by-line identification and justification required by Rule 25-22.006(4)(c), Florida Administrative Code, is attached as Exhibit "C". The material for which confidential classification is claimed and sought is intended to be and is treated by the Company as private and has not been disclosed.

WHEREFORE, Sprint respectfully requests that the Commission grant this Request for Confidential Classification.

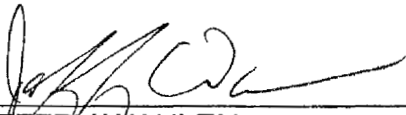
Respectfully submitted this 18<sup>th</sup> day of September, 2003.

SUSAN MASTERTON  
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Tallahassee, Florida 32316  
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and

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and



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[jwahlen@ausley.com](mailto: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 18<sup>th</sup> 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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**SPRINT'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Two Edited Versions with Confidential Information Redacted

Exhibit A

36. What is the cause of the decline in the dollar amount of revenue lost, and what is the percentage of switched access traffic lost due to VoIP?

Answer:

1 Sprint disagrees that there has been a decline in the dollar amount of revenue lost.

2 [REDACTED]

3 [REDACTED]

4 The percentage of traffic lost due to VoIP can be estimated to be 3 percent. For the

5 period August 2002 through May 2003, [REDACTED]

6 [REDACTED] that was terminated over AT&T

7 CLEC local interconnection trunks. For the same time period, [REDACTED]

8 [REDACTED]

9 from AT&T.

10 The sum of the access minutes terminated over local interconnection trunks divided by

11 the sum of the access minutes terminated as access equals [REDACTED]

12 [REDACTED] This is consistent with AT&T's

13 estimate of VoIP Petition filed with the FCC on page 4 where it stated their VoIP traffic

14 was between 1-5% of its total interexchange traffic.

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5 period August 2002 through May 2003, [REDACTED]

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**SPRINT'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

One Version with Confidential Information Highlighted

Exhibit B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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**SPRINT'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Line-by-line Justification

<u>Page</u>	<u>Line(s)</u>	<u>Explanation</u>
6	2, 3, 5, 6, 7, 8, 11, 12	Note 1

Note 1

This information reflects the quantity of the dollar amount of switched access revenue lost to VOIP. Data of this identical type was granted confidential classification in Order No. PSC-03-1019-CFO-TP, issued September 12, 2003, in this docket.