# 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 18, 2003

## **BY 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 32399-0850

Re: Docket Nos. 030868-TL and 030869-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint's Request for Temporary Protective Order for Proprietary Information Provided in Response to Citizens' First Request for Production of Documents (Nos. 1-24).

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.

ours trulv

Enclosures

cc: Certificate of Service List

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DOCUMENT NUMBER - DATE

08942 SEP 188

FPSC-COMMISSION CLERK

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: SPRINT-FLORIDA, INCORPORATED'S PETITION TO REDUCE INTRASTATE SWITCHED NETWORK ACCESS RATES TO INTERSTATE PARITY IN A REVENUE NEUTRAL MANNER PURSUANT TO SECTION 364.164(1), FLORIDA STATUTES

DOCKET NO. 030868-TL FILED: September 18, 2003

# SPRINT'S REQUEST FOR TEMPORARY PROTECTIVE ORDER FOR PROPRIETARY INFORMATION PROVIDED IN RESPONSE TO CITIZENS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-24)

Pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183(2),

Florida Statutes, Sprint-Florida, Incorporated (Sprint) by and through its undersigned counsel,

requests that the Florida Public Service Commission enter a Temporary Protective Order

covering certain proprietary information provided in Sprint's Response to Citizens' First Request

for Production of Documents (specifically the information provided in response to Request No.

5), exempting the information from s. 119.07(1), F.S. In support Sprint states as follows:

1. On September 18, 2003, Sprint provided its Response to Citizens' First Request

for Production of Documents (Nos. 1-24) to the Office of the Public Counsel.

2. Section 364.183(2) provides in relevant part:

Any records provided pursuant to a discovery request for which proprietary confidential business information status is requested shall be treated by the commission and the Office of Public Counsel and any other party subject to the public records law as confidential and shall be exempt from s. 119.07(1), pending a formal ruling on such request by the commission or the return of the records to the person providing the records. 3. Sprint considers the information contained its response to Request No. 5 to be proprietary and confidential. Pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, Sprint is requesting this temporary protective order to protect the confidentiality of the information pending a determination as to whether it will be used in a proceeding before the Commission. As required by the rule, Sprint will file a specific request for confidentiality if the information is ultimately sought to be used in a proceeding before the Commission. Pending further ruling by the Commission regarding the confidential classification of the information, the information should be treated in a confidential manner pursuant to section 364.183(2), F.S. and Rule 25-22.006, F.A.C.

WHEREFORE, Sprint-Florida, Incorporated moves for entry of a Temporary Protective Order exempting from s. 119.07(1), F.S., the proprietary information provided in Sprint's Response to Citizens' First Request for Production of Documents.

RESPECTFULLY SUBMITTED this 1/2/4 day of September 2003.

JOHN PLAN

Fla. Bar No. 0280836 Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 (850) 224-9115

and

SUSAN S. MASTERTON Fla. Bar No. 0494224 Sprint-Florida, Inc. P.O. Box 2214 Tallahassee, FL 32316-2214 (850) 599-1560

ATTORNEYS FOR SPRINT-FLORIDA, INCORPORATED

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail, e-mail or hand delivery (\*) this <u>delivery</u> day of September, 2003, to the following:

Beth Keating, Esq. (\*) Felicia Banks, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Marshall Criser BellSouth Telecommunications 150 S. Monroe St., Suite 400 Tallahassee, FL 32301

Richard Chapkis, Esq. Verizon-Florida P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

Brian Sulmonetti MCI WorldCom Concourse Corporate Center Six Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

Michael A. Gross, Esq. FCTA 246 E. 6th Ave., Suite 100 Tallahassee, FL 32302

Michael B. Twomey P. O. Box 5256 Tallahassee, FL 32314-5256 Charles Beck (\*) Interim Public Counsel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Rm. 812 Tallahassee, FL 32399-1400

Alan Ciamporcero President - Southeast Region Verizon-Florida 201 N. Franklin St., FLTC0006 Tampa, FL 33602

Tracy Hatch/Chris McDonald AT&T Communications 101 N. Monroe St., Suite 700 Tallahassee, FL 32301

Donna McNulty, Esq. MCI WorldCom 1203 Governors Square Blvd.; Suite 201 Tallahassee, FL 32301

Nancy White, Esq. c/o Nancy Sims BellSouth Telecommunications 150 S. Monroe St., Suite 400 Tallahassee, FL 32301

Mark Cooper 504 Highgate Terrace Silver Spring, MD 20904

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