



Susan S. Masterton Attorney

Law/External Affairs

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Enclosure

September 26, 2003

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

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

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

09288-03

1. Surrebuttal Testimony of Jimmy R. Davis and, Non-Proprietary Exhibits JRD-3 through JRD-10

09289-03

2. Non-Proprietary Surrebuttal Testimony of Randy G. Farrar, including Non-Proprietary Exhibits RGF-1 & RGF-2.

09290-03

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SEC OTH 3. Sprint's Requests for Confidential Classification.

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

4. Two redacted hard copies of revised Exhibit JRD-2 and one CD-ROM 09292-03 containing the redacted Exhibit JRD-2.

Copies are being served on the parties in this docket via US mail.

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

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FPSC-BUREAU OF RECORDS

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail & U.S. mail this 26th day of September, 2003 to the following:

Adam Teitzman, Esq. Jason Rojas, Esq. 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

Phillip Carver BellSouth Telecommunications, Inc. 150 S. Monroe Street, Suite 400 Tallahassee, Florida 32301-1556

Florida Cable Telecommunications Association, Incorporated Michael A. Gross 246 E. 6th Avenue, Suite 100 Tallahassee, FL 32303

McWhirter Law Firm Vicki Kaufman/Joseph McGlothlin 117 S. Gadsden Street Tallahassee, Florida 32301

Messer Law Firm Floyd Self/Norman Horton Post Office Box 1876 Tallahassee, Florida 32302 AT&T Communications of the Southern States, Inc. Tracy W. Hatch 101 North Monroe Street, Suite 700 Tallahassee, Florida 32301-1549

AT&T and TCG South
Ms. Lisa Riley
1200 Peachtree St., N.E. Ste. 8066
Tallahassee, Florida 32301-1549

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

Verizon-Florida, Incorporated Richard Chapkis c/o David Christian 106 East College Avenue, Suite 810 Tallahassee, Florida 32301-7704

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

Covad Communications Company Mr. Charles E. Watkins 1230 Peachtree Street, NE, 19th Floor Atlanta, GA 30309-3574 Shook, Hardy & Bacon, LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004

Wilmer Law Firm C. Ronis/D. McCuaig/J. Frankel 2445 M Street, N.W Washington, DC 20037-1420

Beth Keating, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Susan S. Masterton

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: September 26, 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 BellSouth proprietary information that has already been granted confidential status in Order No. PSC-03-0816-CFO-TP or customer specific information that Sprint is required by law to keep confidential. The following documents or excerpts from documents are the subject of this request:

Highlighted portions of Exhibit JRD-6 attached to Jimmy R. Davis Surrebuttal Testimony

Highlighted portions of pages 2 & 4 of Exhibit RGF-1 attached to Randy G. Farrar Surrebuttal Testimony

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- 2. Two redacted copies of the Exhibits are attached to this request. One highlighted unredacted copy of the confidential information is being filed under seal with the Division of Records and Reporting on this same day. The confidential information is highlighted in yellow.
- 3. The information for which the Request is submitted is BellSouth proprietary information that has already been granted confidential status or customer information that Sprint is required by law and contract to keep confidential. 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. Section 364.24(2), F.S., prohibits the release of customer account records.
- 6. The subject information has not been publicly released and Sprint is required by law or contract to keep the information confidential.

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 26th day of September 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
Exhibit JRD-6, column 4, lines 1-8, 10-14, 16-20, and 22-27.	Contains identifying information related to Sprint's wholesale customers that Sprint is required by law and contract to keep confidential.
Exhibit RGF-1, Page 2, column 2, line 8, and page 4, column 3, lines 1 & 7	Contains BellSouth proprietary information that has previously been granted confidential status in Order No. PSC-03-0816-CFP-TP.