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December 1, 2003

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 030868-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint's Request for Confidential Classification and Protective Order Pursuant to Section 364.183(1), Florida Statutes.

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 truly.

Enclosures

cc: Certificate of Service List

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12154 DEC-18 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: December 1, 2003

SPRINT'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND PROTECTIVE ORDER PURSUANT TO SECTION 364.183(1), FLORIDA STATUTES

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 a protective order reflecting such decision and protecting the information in the possession of the Commission and the Office of the Public Counsel. The information that is the subject of this request is contained in certain documents contained in Sprint's Supplemental Answers to Staff's Interrogatories Nos. 33 and 34 and Its Supplemental Response to Request No. 15 served on the Staff of the Commission and Office of Public Counsel on this date.

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

a. Sprint's Supplemental Answer to Staff's Interrogatories Nos. 33 and 34 and Its Supplemental Response to Request No. 15

2. One Unredacted copy of the information has been submitted to the Division of Records and Reporting under seal this same day. The confidential information is identified by gray highlighting. Two redacted copies of the information are attached to this request.

3. The information for which the Request is submitted is trade secret or other highly proprietary competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment "A".

4. Section 364.183(3), 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. Furthermore, Section 688.002(4), Florida Statutes is instructive on what

constitutes a trade secret and provides that:

(4) "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process that:

(a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use; and

(b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

6. The subject information has not been publicly released. Furthermore, release of the information could impair the company's ability to compete for, or negotiate with, certain business customers.

WHEREFORE, based on the foregoing, Sprint respectfully requests that the Commission grant Sprint's Request for Confidential Classification, exempt the information from disclosure under Chapter 119, Florida Statutes and issue a protective order, protecting the information from disclosure while it is maintained at the Commission and in the possession of the Office of the Public Counsel.

RESPECTFULLY SUBMITTED this 1st day of December, 2003.

JOHN

 Fla. Bar No. 0280836

 Ausley & McMullen

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 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 1st day of December, 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

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

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Ben Wilcox Common Cause Florida 704 West Madison Street Tallahassee, FL 32304

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Charles Beck (*) Interim Public Counsel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Rm. 812 Tallahassee, FL 32399-1400

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

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Floyd Self Messer, Caparello & Self, P.A. P. O. Box 1876 Tallahassee, FL 32302

George Meros Gray, Harris & Robinson, P.A. P. O. Box 11189 Tallahassee, FL 32302-3189

Charles J. Rehwinkel Sprint Communications Company, L.P. P. O. Box 2214 Tallahassee, FL 32316-2214

Attorne

ATTACHMENT A

Document and Page and Line Numbers	Justification for Confidential Treatment
	Contains information concerning Sprint's cost to provide competitive services, disclosure of which will harm Sprint's competitive business interests (s. 364.183(3) (e), F.S.)

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