

ORIGINAL



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December 11, 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

RECEIVED FPSC  
COMMISSION  
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03 DEC 11 PM 4:26

Re: Docket No. 030867-TL, 030868-TL, 030869-TL, & 030961-TI

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated are the original and 15 copies of Sprint's Request for Confidential Classification.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to my assistant. If you have any questions, please do not hesitate to call me at 850/847-0244.

Sincerely,

Susan S. Masterton

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FPSC-BUREAU OF RECORDS

Enclosure

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC
- OTH \_\_\_\_\_

1 each dkt  
1 conf records

(for 11794-03)  
DOCUMENT NUMBER-DATE

12879 DEC 11 8

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**CERTIFICATE OF SERVICE**  
**DOCKET NO. 030867-TL, 030868-TL, 030869-TL, & 030961-TI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. Mail this 11<sup>th</sup> day of December to the following:

Florida Public Service  
Commission  
Division of Legal Services  
Beth Keating, Esq.  
Felicia Banks, Esq.  
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Sims/J. Meza/M. Criser  
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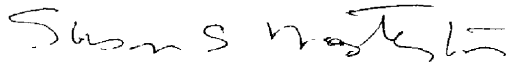
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Charlie Crist/Jack Shreve  
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Tallahassee, FL 32399-1050



Susan S. Masterton

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

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DOCKET NO. 030868-TL  
FILED: December 11, 2003

**Sprint's Request for Confidential Classification Pursuant to Section 364.183(1),  
Florida Statutes**

Sprint-Florida, Incorporated ("Sprint-Florida") 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. The information that is the subject of this request is contained in certain documents included in Sprint-Florida's Answers to Staff's Third Set of Interrogatories.

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

- 1. Highlighted information in Attachment to Response to Interrogatory No. 59**
- 2. Highlighted information in Responses to Interrogatories No. 66 & 67**

2. One unredacted copy of the documents was previously submitted to the Division of Records and Reporting pursuant to a Notice of Intent to Request Confidential Classification on November 20, 2003. The confidential information is identified by yellow 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

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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.

5. The subject information has not been publicly released. Furthermore, release of the information could impair the competitive business of the company.

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 11<sup>th</sup> day of December



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ATTORNEY FOR SPRINT-FLORIDA,  
INCORPORATED

**ATTACHMENT A**

<b>Document and Page and Line Numbers</b>	<b>Justification for Confidential Treatment</b>
Attachment to Interrogatory No. 59, column E, lines 1-14	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.)
Interrogatory No. 66, highlighted information	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.)
Interrogatory No. 67, highlighted information	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.)