# ORIGINAL



Susan S. Masterton Attorney Law/External Affairs

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January 29, 2004

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. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated and Sprint Communications Limited Partnership are the original and 15 copies 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 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

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CTR ECR GCL

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was noting

This confidentiality request was filed by or for a "telco" for DN 283-0. 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.

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## CERTIFICATE OF SERVICE DOCKET NO. 030851-TP & 030852-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 29<sup>th</sup> day of January, 2004 to the following:

AT&T Tracy Hatch (+) 101 North Monroe Street, Suite 700 Tallahassee, FL 32301-1549

AT&T Communications of the Southern States, LLC Ms. Lisa A. Sapper 1200 Peachtree Street, N.E., Ste. 8100 Atlanta, GA 30309-3579

BellSouth Telecommunications, Inc.
R. D. Lackey/M. Mays (+)/N.
White/J. Meza
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite
400
Tallahassee, FL 32301-1556

Covad Communications Company Mr. Charles E. Watkins 1230 Peachtree Street, NE, 19th Floor Altanta, GA 30309-3574

FDN Communications Matthew Feil/Scott Kassman(+) 390 North Orange Avenue, Suite 2000 Orlando, FL 32801-1640

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

ITC DeltaCom Nanette Edwards 4092 South Memorial Parkway Huntsville, AL 35802

KMC Telecom III, LLC Marva Brown Johnson, Esq. 1755 North Brown Road Lawrenceville, GA 30043-8119

McWhirter Law Firm Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

Messer Law Firm Floyd Self (+) P.O. Box 1876 Tallahassee, FL 32302-1876

Verizon Florida Inc. Richard Chapkis (+) P.O. Box 110, FLTC0717 Tampa, FL 33601-0110

Florida Public Service Commission Adam Tietzman/ Jeremy Susac/Pat Lee 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Allegiance Telecom of Florida, Inc. Charles V. Gerkin, Jr. (+) 9201 N. Central Expressway Dallas, TX 75231

Allegiance Telecom, Inc. Terry Larkin 700 East Butterfield Road Lombard, IL 60148

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden St. Tallahassee, FL 32301

MCI WorldCom Communications, Inc.(GA) De O'Roark, Esq. Six Concourse Parkway, Suite 3200 Atlanta, GA 30328

Xspedius Communications Ms. Rabinai E. Carson 5555 Winghaven Blvd., Suite 300 O'Fallon, MO 63366-3868 Phone: (301) 361-4220

Granite Telecommunications, LLC Rand Currier/Geoff Cookman 234 Copeland Street Quincy, MA 02169-4005

MCI WorldCom Communications, Inc. Ms. Donna C. McNulty (+) 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960 Miller Isar, Inc. Andrew O. Isar 7901 Skansie Avenue, St. 240 Gig Harbor, WA 98335

NewSouth Communications Jake E. Jennings Regulatory Affairs & Carrier Relations Two N. Main Center Greenville, SC 29601

Moyle, Flanigan, Katz Raymond & Sheehan, P.A.
Jon C. Moyle, Jr., Esq.
The Perkins House
118 N. Gadsen St.
Tallahassee, FL 32301

Nuvox Communications, Inc. Bo Russell, Vice-President Regulatory & Legal Affairs 301 N. Main St. Greenville, SC 29601

Messer Law Firm Norman Horton P.O. Box 1876 Tallahassee, FL 32302-1876

Office of Public Counsel Charles J. Beck (+) 111 West Madison Street, #812 Tallahassee, FL 32399-1400

Susan S. Masterton

(+ Signed Protective Agreement)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising	)	DOCKET NO. 030851-TP
from Federal Communications Commission's	)	
Triennial UNE review: Local Circuit Switching	)	FILED: January 29, 2004
for Mass Market Customers.	·)	•
	)	

# Sprint Communications Company Limited Partnership's and Sprint-Florida, Incorporated's Request for Confidential Classification Pursuant to Section 364.183(1), Florida Statutes

Sprint Communications Company Limited Partnership and Sprint-Florida, Incorporated (hereinafter, "Sprint") hereby request 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.

1. The information that is the subject of this request is information that is confidential and proprietary to Sprint, the release of which would impair the competitive business of Sprint. Sprint previously filed a Notice of Intent to Request Confidential Classification related to this information on January 7, 2004 and is filing this request pursuant to Rule 25-22-2006, F.A.C. The following documents or excerpts from documents are the subject of this request:

# Highlighted Information on Page 2 of Exhibit KWD-5 Highlighted Information in Exhibit KWD-7

2. Two redacted copies of the information are attached to this request. One unredacted copy of the confidential information was filed under seal with the Division of Records and Reporting on January 7, 2004.

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FPSC-COMMISSION CLERK

- 3. The information for which the Request is submitted is information the release of which would impair Sprint's competitive business interests and is confidential and proprietary to Sprint. 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. The subject information has not been publicly released and Sprint.

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 29th day of January 2004.

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
Highlighted Information on Page 2 of Exhibit KWD- 5	This information is proprietary information obtained by Sprint via its relationship with its vendors. Release of this information would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms s. 364.183(3)(d), F.S.
Highlighted information in Exhibit KWD-7	This information is proprietary, competitively sensitive information relating to Sprint's sales costs. The information is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business of Sprint. Section 364.183(3)(e), F.S.

## Sprint BACE Model Analysis BACE Model Sales Costs Inputs Redacted Version

Sprint-Florida, Inc.
Docket No. 030851-TP
Exhibit KWD - 7
Filed: January 7, 2004

Page 1 of 1

A	В	C	D	E	F	G	Н	I	J	K	L	M
Row	Description		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
6	<b>BACE</b> Model Sales Costs In	put										
7	Mass Market						ļ			ļ		}
8	Residential Customers											
9	SOHO Customers											
10	SME/A Customers											
11	Enterprise Market											
12	SME/B Customers	1										,
13	SME/C Customers											

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A	В	С	D	E	F	G	Н	I	J	K	L	M
Row	Description		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
6	BACE Model Sales Costs Inp	ut										1
7	Mass Market	l										
8	Residential Customers	I										
9	SOHO Customers											
10	SME/A Customers											
11	Enterprise Market											
12	SME/B Customers											
13	SME/C Customers											

Highly Proprietary Sprint Confidential Page 1

Sprint-Florida, Inc. Docket No. 030851-TP Exhibit KWD-5 Filed: January 7, 2004

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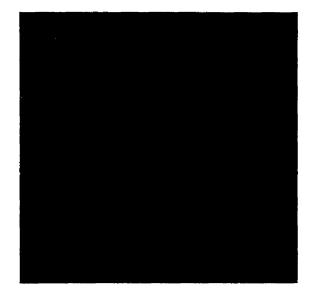
#### **Sprint - BACE Model Analysis**

#### Power Requirements of NGDLC Equipment Correlated to Demand for Voice Line Service

#### **Equipment Addition Necessary**

Advanced Fibre Communications AccessMax Control Shelf Advanced Fibre Communications AccessMax Expansion Shelf Advanced Fibre Communications AccessMax Control Shelf Advanced Fibre Communications AccessMax Expansion Shelf

NGDLC Vendor DC Power
Requirement to Serve
Associated Line Quantities
Per Shelf DC Cumulative DC
Power Power DS0
Requirement Requirement Lines Served



Sprint-Florida, Inc. Docket No. 030851-TP Exhibit KWD-5 Filed: January 7, 2004 Page 2 of 2

#### **Sprint - BACE Model Analysis**

## Power Requirements of NGDLC Equipment Correlated to Demand for Voice Line Service

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Associated Line Quantities
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Power Power DS0
Requirement Requirement Lines Served

