

ORIGINAL

AUSLEY & McMULLEN

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P.O. BOX 391 (ZIP 32302)  
TALLAHASSEE, FLORIDA 32301  
(850) 224-9115 FAX (850) 222-7560

RECEIVED-PPSC

04 MAR 15 PM 3:06

COMMISSION  
CLERK

March 15, 2004

VIA 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 32399-0870

Re: Docket No. 030852-TP

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint's Third Request for Confidential Classification. **Please note that Exhibit B to this request contains a confidential document that is contained in a sealed envelope and should be maintained in the Commission's confidential files.**

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.

RECEIVED & FILED  
*dh*  
FPSC-BUREAU OF RECORDS

Sincerely,

*J. Jeffrey Wahlen*  
J. Jeffrey Wahlen

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

Enclosures

cc: All Parties of Record (w/o confidential Exhibit B)

This confidentiality request was filed by or for a "telco" for DN 03476-04. 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.  
02731-04  
02808-04  
02839-04  
02841-04  
(x-ref. DNS.)

DOCUMENT NUMBER-DATE

03475 MAR 15 03

FPSC-COMMISSION CLERK

*conf records*

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

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DOCKET NO. 030852-TP  
Filed: 03/15/04

**SPRINT'S THIRD REQUEST  
FOR CONFIDENTIAL CLASSIFICATION**

Sprint-Florida, Inc. and Sprint Communications Company, L.P., ("Sprint" or the "Company"), pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. Sprint-Florida, Inc. and Sprint Communications Company, L.P. are telecommunications companies doing business in the State of Florida subject to the jurisdiction of the Florida Public Service Commission ("FPSC" or "Commission") and are parties of record in this docket.

2. Sprint filed the following documents on the dates shown:

<b><u>Document</u></b>	<b><u>Date</u></b>	<b><u>Document No.</u></b>
Answers and Responses to BellSouth's Second Interrogatories and Requests for Admissions and Third Request for Production of Documents	February 24, 2004	02731-04
Supplemental Answers to BellSouth's Second Interrogatories Nos. 21 and 22	February 25, 2004	02806-04
Revised Answers to BellSouth's Second Interrogatories Nos. 14 and 15	February 26, 2004	02842-04
Attachments to Staff's Second Set of Interrogatories	February 26, 2004	02844-04

[hereinafter, the "Documents"] with the Division of Commission Clerk and Administrative Services ("Clerk"), together with Notices of Intent to Request Confidential Classification for

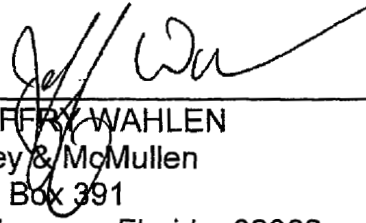
portions thereof. Therein, Sprint asserted that certain information therein was confidential and designated the confidential information by highlighting it with a yellow marker. The Company's confidential filings were assigned Document Numbers as shown above. A non-confidential version (redacted) of the Documents was contemporaneously delivered to the Clerk.

3. In accordance with the procedures set forth in Section 25-22.006(4), Florida Administrative Code, Sprint asserts that the highlighted information in the Documents is "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes, and requests that the Commission keep that information confidential and exempt from public disclosure in accordance with Section 25-22.006(4), Florida Administrative Code.

4. Two edited versions of the Documents with the confidential information redacted are attached as Exhibit "A." Another copy of the Document with the confidential information highlighted is included as Exhibit "B." The line-by-line identification and justification required by Rule 25-22.006(4)(c), Florida Administrative Code, is attached as Exhibit "C." The material for which confidential classification is claimed and sought is intended to be and is treated by the Company as private and has not been disclosed.

WHEREFORE, Sprint respectfully requests that the Commission grant this Request for Confidential Classification.

DATED this 15<sup>th</sup> day of March, 2004.



---

J. JEFFREY WAHLEN  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, Florida 32302  
(850) 425-5471  
(850) 222-7560 (fax)  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

ATTORNEYS FOR SPRINT-FLORIDA, INC.  
and SPRINT COMMUNICATIONS COMPANY  
LIMITED PARTNERSHIP

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

---

DOCKET NO. 030852-TP  
Filed: 03/15/04

**SPRINT'S REQUEST**  
**FOR CONFIDENTIAL CLASSIFICATION**

Edited Version (Public)

Confidential Information Redacted

Exhibit A

STATE OF FLORIDA

COMMISSIONERS:  
BRAULIO L. BAEZ, CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
RUDOLPH "RUDY" BRADLEY  
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK &  
ADMINISTRATIVE SERVICES  
BLANCA S. BAYÓ  
DIRECTOR  
(850) 413-6770 (CLERK)  
(850) 413-6330 (ADMIN)

# Public Service Commission

## ACKNOWLEDGMENT

DATE: 2-25-04

TO: Sprint - Florida, Inc.  
FROM: Theray, Division of the Commission Clerk and  
Administrative Services  
RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No. 030852-TP or (if filed in an undocketed matter) concerning suppl. answers to BellSouth and reg. 21 & 22, and filed on behalf of J. Wahlen. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6770.

PSC/CCA019-C (Rev 01/04)

SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 22  
PAGE 1 OF 1

22. Please provide your costs in material and labor, including any discounts from equipment vendors, for each of the elements identified in response to Interrogatory 21, above.

**CONFIDENTIAL**

Answer:

The terminal equipment investments represent the investment for the entire shelf and common equipment. The related terminal card investments represent the cost per card by bandwidth option (DS-3, OC-3, OC-12, OC-48).

All investment amounts represent preferred-vendor costs for equipment configured for typical usage. Shipping and handling are included in the investment amount shown.

EF&I Investment per Unit is the sum of Material, Engineering/Installation Labor and Sales Tax.

	A
	<u>Cost of EF&amp;I</u>
	<u>Investment per Unit</u>
<u>Material</u>	
Fiber Optic Terminal SMX OC-3	.
DS-3 Card, single term with line driver/receiver	.
Fiber Optic Terminal SMX OC-12	.
4 DS-3 Card (OC12)	5
OC-3 Card	.
Fiber Optic Terminal SMX OC-48	.
4 DS-3 Card (OC-48)	.
OC-3 Card	.
OC-12 Card	10
DSX3 Cross Connect Shelf	.
DSX3 Cross Connect Card	12
3/1 Multiplexer	

STATE OF FLORIDA

COMMISSIONERS:  
BRAULIO L. BAEZ, CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
RUDOLPH "RUDY" BRADLEY  
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK &  
ADMINISTRATIVE SERVICES  
BLANCA S. BAYÓ  
DIRECTOR  
(850) 413-6770 (CLERK)  
(850) 413-6330 (ADMIN)

# Public Service Commission

## ACKNOWLEDGMENT

DATE: 2-24-04

TO: Sprint - Florida

FROM: Thermy, Division of the Commission Clerk and  
Administrative Services

RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

030852-TP or (if filed in an undocketed matter) concerning 8 3rd PDD 4  
ans & resp. to BelSouth 2nd RFA & Int. 8-32, and  
filed on behalf of J. Wahlen. The

document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6770.

PSC/CCA019-C (Rev 01/04)



SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 15  
PAGE 1 OF 1

15. Please provide your costs in materials and labor, including any discounts from equipment vendors, for each of the elements in Interrogatory 14.

Answer: The total cost of each component required to channelize OCn facilities into DS3 and DS1 is listed in the table below. The terminal equipment investments represent the investment for the entire shelf and common equipment. The related terminal card investments represent the cost per card by bandwidth option (DS1, DS3, OC3, OC48).

All investment amounts represent vendor costs for equipment configured for typical usage. Shipping and handling are included in the investment amount shown.

EF&I Investment per Unit is the sum of Material, Engineering/Installation Labor and Sales Tax. The costs shown below do not include the costs of the complexities covered in Sprint witness Dickerson surrebuttal testimony (page 6 line 8 through page 7 line 12) associated with self provisioning dedicated transport.

<u>Material</u>	<u>Cost of EF&amp;I</u> <u>Investment per Unit</u>
Fiber Tip Cable (Per System)	1
Fiber Patch Panel (Per System)	.
SONET Terminal Shelf (OC3)	.
DS3 Card	.
DS1 Card	5
SONET Terminal Shelf (OC12)	.
OC3 Card	.
4 DS3 Card (OC12)	.
SONET Terminal Shelf (OC48U)	.
4 OC3 Card	10
12 DS3 Card (OC48U)	.
DSM - DS1 Interface	.
SONET Terminal Shelf (OC48B)	.
OC3 Card	.
3 DS3 Card (OC48B)	15
SONET Terminal Shelf (OC192B)	.
OC48 Card (Tributary)	.
4 OC3 Card	.
DSM - DS1 Interface	.
DSX3 Cross Connect Shelf	20
DSX3 Cross Connect Card	.
DSX1 Cross Connect Jack Field	22

SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 28  
PAGE 1 OF 1

28. On page 6 of his rebuttal testimony, FCCA witness Gary J. Ball states, "Although a CLEC may possess a facility that passes by two collocations, it will only rarely connect those two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE." Identify each and every instance in the state of Florida where you possess a facility that passes by two collocations, and you have connected those two collocations to create a service configuration that is functionally equivalent to the dedicated transport UNE.

Answer:

Sprint has collocations in the \_\_\_\_\_ and \_\_\_\_\_ BellSouth central offices which are connected to a fiber facility deployed by Sprint.

**CONFIDENTIAL**

Sprint  
Docket No. 030852-TP  
BellSouth's Second Request for Admissions and Second Set of Interrogatories  
Filed: February 24, 2004  
Interrogatory No. 8 and 9

A	B 8 a) Termination Point	C 8 b) Termination CLLI	D 8 c) Street Address	E City	F 9 Own Fiber or Lease?	G 9 a) Lease from	H 9 b) IRU?
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Attachment B

CONFIDENTIAL

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH										
1		Customer Information				Self-Providers										Wholesalers																												
2		Customer Information				High-Capacity					Number of circuits					High-Capacity					Number of circuits																							
3		Street Address	City	Zip	Wire Center CLLI	Self-Provider? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Wholesaler? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Point-to-Point (P) or Ring (R) configuration	Accessible? (Y/N)	Sole Access? (Y/N)	Using? (Y/N)	Giving? (Y/N)	Owner? (Y/N)	Loop Owner?	Loop Wholesaler?	Nature of agreement?										
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PH-13

STATE OF FLORIDA

COMMISSIONERS:  
BRAULIO L. BAEZ, CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
RUDOLPH "RUDY" BRADLEY  
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK &  
ADMINISTRATIVE SERVICES  
BLANCA S. BAYÓ  
DIRECTOR  
(850) 413-6770 (CLERK)  
(850) 413-6330 (ADMIN)

Public Service Commission

ACKNOWLEDGMENT

DATE: 2.26.04

TO: Sprint - Florida

FROM: J. Henry, Division of the Commission Clerk and  
Administrative Services

RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No. 030852-TP or (if filed in an undocketed matter) concerning revised ans. to BellSouth and Reg. 14 & 15, and filed on behalf of Sprint - Florida. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6770.

PSC/CCA019-C (Rev 01/04)

SPRINT  
DOCKET NO. 030852-TP  
BELLSOUTH'S SECOND SET  
INTERROGATORY NO. 15  
PAGE 1 OF 1  
REVISED

15. Please provide your costs in materials and labor, including any discounts from equipment vendors, for each of the elements in Interrogatory 14.

**Answer:** The total cost of each component required to channelize OCn facilities into DS3 and DS1 is listed in the table below. The terminal equipment investments represent the investment for the entire shelf and common equipment. The related terminal card investments represent the cost per card by bandwidth option (DS1, DS3, OC3, OC12, OC48).

All investment amounts represent preferred-vendor costs for equipment configured for typical usage. Shipping and handling are included in the investment amount shown.

EF&I Investment per Unit is the sum of Material, Engineering/Installation Labor and Sales Tax.

<u>Material</u>	A <u>Cost of EF&amp;I Investment per Unit</u>
Fiber Tip Cable (Per Fiber)	1
Fiber Patch Panel (Per Fiber)	.
Sonet Terminal Shelf (OC3)	.
D S 3 Card	.
D S 1 Card	5
Sonet Terminal Shelf (OC12)	.
O C 3 Card	.
D S 3 Card (OC12)	.
Sonet Terminal Shelf (OC48 LUC)	.
O C 3 Card	10
3 D S 3 Card (OC48 LUC)	.
Sonet Terminal Shelf (OC48 AL)	.
O C 3 Card	.
3 D S 3 Card (OC48 AL)	.
DSX3 Cross Connect Shelf	15
DSX3 Cross Connect Card	.
DSX1 Cross Connect Jack Field	17

CONFIDENTIAL

STATE OF FLORIDA

COMMISSIONERS:  
BRAULIO L. BAEZ, CHAIRMAN  
J. TERRY DEASON  
LILA A. JABER  
RUDOLPH "RUDY" BRADLEY  
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK &  
ADMINISTRATIVE SERVICES  
BLANCA S. BAYO  
DIRECTOR  
(850) 413-6770 (CLERK)  
(850) 413-6330 (ADMIN)

# Public Service Commission

## ACKNOWLEDGMENT

DATE: 2-26-04

TO: Sprint - Florida

FROM: Henry, Division of the Commission Clerk and  
Administrative Services

RE: Acknowledgment of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No.

D30852-TP or (if filed in an undocketed matter) concerning \_\_\_\_\_

Attach's to ans. to Staff 2nd Rog., and  
filed on behalf of Sprint-Florida. The

document will be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6770.

PSC/CCA019-C (Rev 01/04)

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850

An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

Internet E-mail: [contact@psc.state.fl.us](mailto:contact@psc.state.fl.us)

	A	B	Channelized Capacity			Capacity in Use			I	J
	BellSouth Wire Centers on Ring See Note 1	Terminating Sprint POP CLLI	L DS1	D DS3	E Ocn	F DS1	G DS3	H Ocn	Dark Fiber Provider	Comments
Sprint Miami Ring 1	1									Sprint disputes that any routes on this ring quality for BellSouth's trigger analysis on the basis that no DS1s or DS3s have been deployed
Sprint Miami Ring 2	5									Sprint disputes that any routes on this ring quality for BellSouth's trigger analysis on the basis that no DS1s or DS3s have been deployed
Sprint Jacksonville Ring	6									Sprint disputes that any routes on this ring quality for BellSouth's trigger analysis on the basis that no DS1s or DS3s have been deployed

119

13

Note 1: Each of the wirecenters in connected to the fiber ring to transport Sprint's interexchange long distance traffic to the Sprint POP listed in the next column.

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A	B 48(a) Deployed or Leasing facilities at Location?	C 48(b) Provide Retail Service at Location?	D 48(c) Provide Wholesale Service at Location?	E 48(d) Access to Entire Location? (See Note)	F 48(e) Channelized Capacity and Quantity for Retail?			G 48(f) Channelized Capacity and Quantity for Wholesale?			H 48(g) Loops that Cannot be Channelized at DS1 or DS3 level?	I 48(h) Provisioned dark fiber?	J 48(i) Working Dark Fiber?
					DS1	DS3	OCn	DS1	DS3	OCn			

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CONFIDENTIAL

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH			
1	Customer Information					Self-Providers								Wholesalers																							
2	Customer Information					High-Capacity				Number of circuits				High-Capacity				Number of circuits																			
3	Street Address	City	Zip	Wire Center CLLI	Self-Provider? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Wholesaler? (Y/N)	Dark Fiber? (X or blank)	DS1? (X or blank)	DS3? (X or blank)	# Dark Fiber provisioned circuits	# DS1 level provisioned circuits	# DS3 level provisioned circuits	# Dark Fiber working circuits	# DS1 level working circuits	# DS3 level working circuits	Point-to-Point (P) or Ring (R) configuration	Accessible? (Y/N)	Sole Access? (Y/N)	Using? (Y/N)	Giving? (Y/N)	Owner? (Y/N)	Loop Owner?	Loop Wholesaler?	Nature of agreement?				
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013  
No. 47

CONFIDENTIAL



Sprint  
 Docket 030852-TP  
 Staff's Second Set  
 Interrogatory 50

INDEX	CLI 1	CLI 2	LATA	50(a)			50(b)			Comments
				Deployed own fiber or IRU?			Capacity level provisioned			
				DS1	DS3	Ocn	DS1	DS3	Ocn	
1 2	A	B	C	D						L Route does not qualify for trigger; see Note 3 Route does not qualify for trigger; see Note 3

Note 1: Route does not qualify for triggers as Sprint has not deployed DS1s or DS3s on this route  
 Note 2: Route does not qualify for triggers because the underlying transport facility is provided via a month-to-month UNE dark fiber lease from BellSouth  
 Note 3: Route does not qualify for triggers as the two collocations are on two separate fiber rings that do not connect

015

CONFIDENTIAL

CONFIDENTIAL

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

---

DOCKET NO. 030852-TP  
Filed: 03/15/04

**SPRINT'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION**

Confidential Version

Confidential Information Highlighted

Exhibit B

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

DOCKET NO. 030852-TP  
 Filed: 03/15/04

**SPRINT'S REQUEST  
 FOR CONFIDENTIAL CLASSIFICATION**

Line-by-line Analysis

<u>Page</u>	<u>Lines</u>	<u>Columns</u>	<u>Explanation</u>
002	1-12	A	Note 1
004	1-22	A	Note 1
005	Data		Note 2
006	1-13	A – H	Note 3
007	4- 40	A – AH	Note 3
009	1-17	A	Note 1
011	1-13	A – J	Note 3
012	1-14	A – J	Note 3
013	4 – 40	A – AH	Note 3
014	1 – 51	A – K	Note 3
015	1 – 2	A – K	Note 3

Note 1: This data shows the component parts of the Company's Investment Cost of EF & I on a per unit basis. This data shows detailed costs of portions of Sprint's network that it uses to provide CLEC services to customers and potential customers in Florida. This type of data shows the installed cost of certain materials and reflects the relative bargaining power Sprint has with suppliers. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint. This type of data is the type of data specifically declared to be confidential in Section 364.183(3)(d), Florida Statutes, in that disclosure would impair the efforts of the Company to contract for goods and services on favorable terms.

Note 2: These data points show central offices where Sprint has collocations that are

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport.

---

DOCKET NO. 030852-TP  
Filed: 03/15/04

**SPRINT'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION**

Line-by-line Analysis

connected to a fiber facility deployed by Sprint. This data shows detailed components of Sprint's network and how it has configured its network to provide CLEC services to customers and potential customers in Florida. This type of data can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.

Note 3: This document identifies the locations or routes where Sprint either uses (1) dark fiber from BellSouth on a UNE basis, (2) its own facilities, and (3) fiber leased from third parties to connect loops that terminate in the collocation to a Sprint switch. It also shows detailed information about the manner in which Sprint routes traffic on certain routes and whether Sprint leases, self-provisions or uses BellSouth UNEs on those routes. It reflects some or all of the following information: CLLI codes, street addresses, cities, own or lease and third party fiber providers, capacity and number of circuits and amounts in use. This data shows detailed components of Sprint's network and how it has configured its network to provide CLEC services to customers and potential customers in Florida. This type of data can be used to determine Sprint's plans and abilities to compete for customers in the telecommunication markets. This type of data for Sprint's competitors is not publicly available; therefore, disclosing this data to the public would put Sprint at a disadvantage relative to its competitors, thereby harming Sprint.

Exhibit C  
2 of 2

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing without Exhibit B has been furnished via Electronic Mail, U. S. Mail or Hand Delivery (\*) 15<sup>th</sup> day of March, 2004, to the following:

Adam Teitzman \*  
Beth Keating \*  
Division of Legal Services  
Florida Public Service Comm.  
Division of Legal Services  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
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A handwritten signature in black ink, appearing to read "Jeff Wu", is written over a horizontal line. The signature is stylized and cursive.

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