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March 19, 2004

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Ms. Blanca Bayó, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. are an original and fifteen copies of MCI WorldCom Communications, Inc.'s Request for Confidential Classification for information contained in its Responses and Objections to BellSouth's First Set of Interrogatories (1-84) and First Request for Production of Documents (1-21) filed in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Monica M. Evans

FR

Floyd R. Self

FRS/amb
Enclosures
cc: Parties of Record

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This confidentiality request was filed by or for a "telco" for DN 10790-03 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.

(for 10790-03)
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements arising)
from Federal Communications Commission) Docket No. 030851-TP
triennial UNE review: Local Circuit Switching)
for Mass Market Customers) Filed: March 19, 2004
_____)

MCI's REQUEST FOR CONFIDENTIAL CLASSIFICATION

MCImetro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (hereinafter "MCI"), pursuant to section 364.183, Florida Statutes, and Rule 25-2.006, Florida Administrative Code, requests confidential classification of certain data previously filed in this docket pursuant to a claim for confidentiality. In support of this request MCI hereby states:

1. On October 30, 2003, MCI filed in the above-captioned proceeding its Responses and Objections to BellSouth's First Set of Interrogatories (1-84) and First Requests for Production of Documents (1-21). MCI's Responses to Interrogatories 1-5, 8-14, 18-21, 24-32, 34-36, 45-49, 69 and Requests for Production 1, 3-7, 9, 10, and 14-16 contained confidential information that is considered proprietary. When MCI filed its Response, it filed the appropriate corresponding Claim for Confidential Treatment, in accordance with Rule 25-22.006(5) and section 364.183(1), Florida Statutes.

2. MCI hereby files this Request for Confidential Classification, in accordance with Rule 25-22.006(4), Florida Administrative Code, for its Responses to Interrogatories 1-5, 8-14, 18-21, 24-32, 34-36, 45-49, 69 and its Requests for Production 1, 3-7, 9, 10, and 14-16. The public and redacted copies required by Rule 25-22.006(4) are not being filed at this time as they were filed with the claim filed on October 30, 2003.

3. The information for which confidential classification is requested reveals confidential and proprietary business information. Specifically, the information includes:

(a) Responses to Interrogatories 1-4, 8, 9 and 10 includes network planning switch information, which identifies the number and location of switches owned by MCI, the type of switch, the CLLI code of the switch, and the manufacturer and model of the switch; the response to Interrogatory 2 also identifies local switch utilization information.

(b) Response to Interrogatory 5 identifies the name, location, and CLLI code of each wire center in which MCI provides service to end user customers in Florida;

(c) Responses to Interrogatories 11, 12, and 13 identify the name, address, and CLLI code each wire center in which MCI provides service to end users in Florida and the total number customers and lines per customer account;

(d) Responses to Interrogatories 14, 18, 34, 36, 45-49, 69 include confidential information regarding MCI's switching capacity, telemarketing costs, local market share, marketing deployment and decision making, costs and expenses, use of the CFA database;

(e) Responses to Interrogatories 25-32 identifies the MCI's number of end user accounts, end user average revenue, and average lines per end user;

(f) Response to Interrogatory 35 identifies the churn rates for MCI customers.

4. MCI considers the above information to be trade secrets and information relating to competitive interests which, if disclosed, would be of benefit to competitors and cause harm to MCI and its customers. Such information provides MCI an economic benefit, and is not known or readily ascertainable to other persons. Such information is economically valuable to MCI and its competitors, and MCI treats such information as

confidential and maintains many processes and procedures to maintain its secrecy.

5. One of MCI's most valuable assets is its customer base. Any public disclosure of this customer base, for instance disclosure of the number of customers or of MCI's percentage of residential and business customers, would be unfair, competitively adverse, and extremely damaging to MCI. Additionally, the information contained in the confidential responses contains market deployment data and other specific network information utilized by MCI to conduct its business. MCI has invested enormous amounts of time and money structuring and deploying its marketing strategies which will be wasted if this information is released to the public.

6. A trade secret is defined in section 688.002(4), Florida Statutes, the Uniform Secrets Act, to mean:

[I]nformation, including a formula, pattern, compilation, program, devise, method, technique, or process that:


(a) Derives independent economic value, actual or potential, from not being generally known to, and not be 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.

The information at issue fits plainly in this definition as set forth above. Additionally, disclosure of this information will impair the competitive business of MCI. Therefore, the Commission should grant the request for confidential classification and find the information contained in MCI's Responses to Interrogatories 1-5, 8-14, 18-21, 24-32, 34-36, 45-49, 69 and Requests for Production 1, 3-7, 9, 10, and 14-16 to be confidential and exempt from section 119.071(1), pursuant to section 364.183(3)(a) and (e).

WHEREFORE, based on the foregoing, MCI respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an Order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted,


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Attorneys for MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery (*) and/or U.S. Mail on this 19th day of March, 2004.

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