

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: March 19, 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 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:

**Sprint's attachment to Staff's POD 22 (CD only, entire CD) (Document No. 01993-04)**

**Highlighted information in Sprint's Response to Staff's Int. No. 22 and No. 28 f-j (Document No. 02366-04)**

**Highlighted information in attachment to Sprint's Response to Staff's Interrogatory No. 15, 18, and 23 (CD only) (Document No. 02366-04)**

This confidentiality request was filed by or for a "telco" for DN \_\_\_\_\_. 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.

(01993-04 + 02366-04)

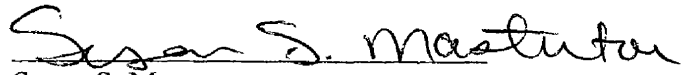
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 FPSC-COMMISSION CLERK

**Highlighted information in Sprint's Response to Staff's POD No. 13 and POD No. 14 (Document No. 02366-04)**

2. Two redacted copies of the information are attached to this request. One unredacted copy of the information was filed under separate cover on:
  - Document No. 01993-04 on February 11, 2004
  - Document No. 02366-04 on February 18, 2004
3. The information for which the Request is submitted contains information that is proprietary to Sprint or information that is the subject of a prior request for confidential classification by another party to this proceeding. Detailed justification for the request for confidential classification 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. 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 19th day of March 2004.



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ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Sprint's attachment to Staff's POD 22 (CD only, entire CD)(Document No. 01993-04)	Contains information from BellSouth's BACE model for which BellSouth requested confidential classification which was granted by the Commission Order No. PSC-04-0193-CFO-TP and information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to Staff's Int. No. 22 (Document No. 02366-04)	Contains information that is subject to a Claim of Confidentiality for information provided in Response to Staff data requests filed by KMC on 12/19/03.
Highlighted information in Sprint's Response to Staff's Interrogatory No. 28 f-j (Document No. 02366-04)	Contains information related to Sprint's provision of competitive local service, which is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in attachment to Sprint's Response to Staff's Interrogatory No. 15 (Document No. 02366-04)	Contains Sprint vendor information, the disclosure of which would impair the efforts of Sprint to contract for goods and services on favorable terms.
Information in attachment to Sprint's Response to Staff's Interrogatory No. 18, page 1, columns D-M, lines 10-14; page 2, columns D-M, lines 10-29 and lines 33-45; page 3, columns D-M, lines 50-66; page 4, column C, lines 10-13, 15-18 and 21-23; page 5, columns B & C, lines 9-12; page 6, columns C-E, lines 19-27 and	Contains financial information relating to Sprint's competitive local service offerings, which is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.

<p>highlighted information in Note on page 6 and 7; and page 7, columns C-P, lines 10-12.</p>	
<p>Attachment to Sprint's Response to Staff's Interrogatory No. 23 (CD only) Entire CD. (Document No. 02366-04)</p>	<p>Contains information provided by BellSouth in Response to discovery for which BellSouth requested Confidential Classification which was granted by the Commission in Order No. PSC-04-0193-CFO-TP</p>
<p>Highlighted information in Sprint's Response to Staff's POD No. 13 (Document No. 02366-04)</p>	<p>Contains information related to Sprint's bad debt expenses, which is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.</p>
<p>Highlighted information in attachment to Sprint's Response to Staff's POD No. 14</p>	<p>Contains information from BellSouth's BACE model for which BellSouth requested confidential classification which was granted by the Commission Order No. PSC-04-0193-CFO-TP</p>