

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated)	Docket No. 041144-TP
Against KMC Telecom III LLC,)	
KMC Telecom V, Inc. and KMC Data LLC,)	
for failure to pay intrastate)	
Access charges pursuant to its interconnection)	
Agreement and Sprint's tariffs and for violation of)	
Section 364.16(3)(a), Florida Statutes.)	Filed: April 14, 2005
_____)	

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

Sprint-Florida, Incorporated (hereinafter, "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 and issue any appropriate protective order reflecting such a decision.

1. The information that is the subject of this request is confidential and proprietary as described in paragraph 3. Sprint previously filed a Claim and Notice of Intent to Request Confidential Classification related to this information on February 28, 2005 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 portions of Exhibit WLW-2

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 February 28, 2005 (a portion of Document No. 02033-05).

Simultaneously with this filing, Sprint is re-filing an additional unredacted copy of the information with the confidential portions highlighted in yellow

3. The information for which the Request is submitted is KMC customer account information that Sprint is required by law and/or contract (Sprint's interconnection agreements with KMC) to keep confidential, pursuant to s. 364.24, F.S. or is Agilent proprietary trade secret information relating to Agilent's processes and methodology that Sprint is required by contract to keep confidential and the disclosure of which would impair Sprint's ability to contract for goods or services and would harm the company's business operations (See, s. 364.183(3) and (3)(a) and (d), F.S.) 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. Section 364.24, Florida Statutes, prohibits a telecommunications company from intentionally disclosing customer account records, except as authorized by the customer or allowed by law.
- 6. **The subject** information has not been publicly released by 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 14th day of April 2005.

Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560
850.878-0777 (fax)
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Exhibit WLW-2, page 4, lines 4-9 and Table 1, lines 3-8, columns A-I, and line 9, columns B-I	This information is KMC customer account information that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, Page 5, highlighted information on lines 3 & 4 and Chart 1.	This information is KMC customer account information that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 6, highlighted information on lines 6 & 7	This information is Agilent proprietary trade secret information relating to Agilent's processes and methodology that Sprint is required by contract to keep confidential and the disclosure of which would impair Sprint's ability to contract for goods and services and would harm Sprint's business operations (Section 364.183(3) and (3)(a) and (d), F.S.
Exhibit WLW-2, page 6, Table 2, lines 1-8, columns A-D	This information is Agilent proprietary information relating to Agilent's processes and methodology that Sprint is required by contract to keep confidential and the disclosure of which would impair Sprint's ability to contract for goods and services and would harm Sprint's business operations (Section 364.183(3) and (3)(a) and (d), F.S.), and KMC customer account information that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 6, Table 3, lines 3 & 4, columns B, D, E, F, and I	This information is KMC customer account information that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 7, Table 4, lines 2-7, columns A-D and Table 5, lines 3-12, columns A-C	This information is KMC customer account information that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.

Exhibit WLW-2, page 8, highlighted information on lines 8-11 and in footnote 1	This information is IXC customer account information that Sprint is required by law to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 9, Table 6, line 1, columns B-E, lines 3-8, columns A-F, and line 9, columns B-F	This information is KMC and IXC customer account information that Sprint is required by law and/or contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 10, highlighted information on lines 2 and 10, and Figure 2, lines 2, 4, 6, 7, 9, 10, 11, and 12	This information is KMC and IXC customer account information that Sprint is required by law and/or contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 11, line 1 and Figure 3, lines 2, 3, 4, 6, 7, 9, 10, 11, and 12	This information is KMC and IXC customer account information that Sprint is required by law and/or contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, page 12, highlighted information on lines 4 and 5 and Table 7, lines 3-5, columns A-I	This information is KMC and IXC customer account information that Sprint is required by law and/or contract to keep confidential. Section 364.24, F.S.
Exhibit WLW-2, highlighted information on lines 8, 9, and 11, Table 8, lines 2-7, columns A-E, and Table 9,	This information is KMC and IXC customer account information that Sprint is required by law and/or contract to keep confidential. Section 364.24, F.S.

lines 3-8, columns A-F and line 9, columns B-F	
Exhibit WLW- 2, page 14, lines 2-25	This information is Agilent proprietary information relating to Agilent's processes and methodology that Sprint is required by contract to keep confidential and the disclosure of which would impair Sprint's ability to contract for goods and services and would harm Sprint's business operations (Section 364.183(3) and (3)(a) and (d), F.S.