

ORIGINAL



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May 31, 2005

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
& Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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Re: Docket No. 041144-TP

Dear Ms. Bayó

Enclosed for filing on behalf of Sprint-Florida, Incorporated are the original and 15 copies of Sprint's Request for Confidential Classification related to Sprint's Rebuttal Testimony filed on May 10, 2005.

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,

CMP 1
COM _____
Susan S. Masterton

CTR _____ Susan S. Masterton

ECR _____ Enclosure

GCL 1

OPC _____

MMS _____

RCA _____

SCR _____

SEC 1

OTH 1 *conf records*

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[Signature]
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DOCUMENT NUMBER-DATE
05274 MAY 31 05
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 041144-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 31st day of May, 2005 to the following:


Division of Legal Services
Lee Fordham/ Mary Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy Pruitt/Ann Marsh
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

KMC Data LLC/KMC Telecom III LLC/KMC Telecom V, Inc.
Marva B. Johnson/Mike Duke
1755 North Brown Road
Lawrenceville, GA 30043-8119

Kelley Drye & Warren LLP
Chip Yorkgitis / Barbara Miller
1200 19th Street, N.W.,
Fifth Floor
Washington, DC 20036

Messer Law Firm
Floyd R. Self, Esq.
P.O. Box 1876
Tallahassee, FL 32302-1876



Susan S. Masterton

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: May 31, 2005
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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 set forth in paragraph 3. Sprint previously filed a Notice of Intent to Request Confidential Classification related to this information on May 10, 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:

- a. Revised Exhibit WLW-5 (on CD only)
- b. Exhibit RA-1
- c. Exhibit RA-2
- d. Highlighted information on pages 8, 9 and 21 of James R. Burt's Rebuttal Testimony
- e. Exhibit JRB-1
- f. Exhibit JRB-2 (on CD only)
- g. Highlighted information on page 3 of Christopher M. Schaffer's Rebuttal Testimony
- h. Exhibit CMS-3

DOCUMENT NUMBER-DATE

05274 MAY 31 05

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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 May 10, 2005 (Document No. 04562-05).

3. The information for which the Request is submitted is KMC customer account information or other Sprint customer information that Sprint is required by law (section 354.24, F.S.) or contract (Sprint's interconnection agreements with KMC) to keep confidential. 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.

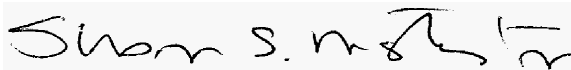
5. Section 364.24, Florida Statutes, prohibits a telecommunications company from intentionally disclosing customer account records, except as authorized by the customer or allowed by law.

6. **The subject information has not been publicly released by Sprint.**

7. **The Commission has previously granted confidential classification to similar information filed in this docket in Order No. PSC-05-0542-CFO-TP.**

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 31st day of May 2005.



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ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Revised Exhibit WLW-5 (on CD only)	This information is KMC customer account information (call detail records) that Sprint is required by law and contract to keep confidential. Section 364.24, F.S. Original Exhibit WLW-5 (containing a subset of the CDRs included in Revised Exhibit WLW-5) was granted confidential classification by the Commission in Order No. PSC-05-0542-CFO-TP
Exhibit RA-1	This information is KMC customer account information (minutes of use) that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit RA-2	This information is KMC customer account information (PLUs/PIUs, minutes of use and associated intercarrier compensation) that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Highlighted information of page 8, lines 20 & 21; page 9, lines 1, 3, 4 & 5; and page 21, line 6 of James R. Burt's Rebuttal Testimony	This information is KMC customer information that KMC has claimed confidential in this proceeding.
Exhibit JRB-1	This information is KMC customer information that KMC has claimed confidential in this proceeding.
Exhibit JRB-2	This information is Sprint customer information (customer billing and usage information for Sprint end users) that Sprint is required by law to keep confidential. Section 364.24, F.S.
Highlighted information on page 3, line of Christopher M. Schaffer's Rebuttal Testimony	This information is KMC customer account information (specific trunk group identification) that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.
Exhibit CMS-3	This information is KMC customer account information (KMC ARMS Orders) that Sprint is required by law and contract to keep confidential. Section 364.24, F.S.