

yz

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US Sprint.

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March 12, 1991

Mr. Steven Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

Re: ~~Docket No. 910060~~-TP, In Re: Petition of the Attorney
General and the Public Counsel to Initiate Rulemaking
Proceedings Governing 900 Service

Dear Mr. Tribble:

Enclosed for filing with the Commission are an original and fifteen (15) copies of Sprint Gateways' Motion for a Permanent Protective Order, and three copies of Sprint Gateways' responses to the Staff's February 19, 1991 Data Request Nos. 1-12. The responses to Questions 3, 4, 5, 6, and 7 include proprietary information which has been deleted from two of the copies of the responses. The other copy of the responses includes highlighted proprietary information which should be excluded from the public record. The responses were prepared by Mr. Michael Nelson, Staff Director-Regulatory.

Please return a filed-stamped copy of this letter to me. Thank you for your assistance in this matter.

Very truly yours,

Craig D. Dingwall
Craig D. Dingwall
General Attorney

cc: Parties of Record
Mr. Tony Key
Mr. Mike Nelson

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER DATE

02493 MAR 13 1991

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of the Attorney General) Docket No. 900633-TL
and Public Counsel to Initiate)
Rulemaking Proceedings Governing) Filed: March 13, 1991
900 Service.)
_____)

**SPRINT GATEWAYS' REQUEST FOR
CONFIDENTIAL CLASSIFICATION AND MOTION
FOR A PERMANENT PROTECTIVE ORDER**

Sprint Gateways, pursuant to Rule 25-22.006, Florida Administrative Code, and Rule 1.280(c), Florida Rules of Civil Procedure, files its Request for Confidential Classification and Motion for a Permanent Protective Order regarding Sprint Gateways' responses to Staff's February 19, 1991 Data Request Nos. 3, 4, 5, 6, and 7.

1. On February 19, 1991, the Florida Public Service Commission ("Commission") Staff requested Sprint Gateways to respond to twelve (12) data requests. Data Request Nos. 3, 4, 5, 6, and 7 requested proprietary information pertaining to the financial impact associated with various proposed rule changes suggested by the Attorney General.

2. Concurrent with this Motion, Sprint Gateways has filed in a separate, sealed envelope its proprietary responses to Questions 3, 4, 5, 6 and 7. Three copies of the proprietary responses accompany this Request and Motion. The proprietary information has been highlighted on one copy, and deleted on the other two copies. The copies with the proprietary information deleted are for public inspection.

3. The material for which confidential classification is sought pursuant to this Request and Motion is intended to be and is

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treated by Sprint Gateways as private and has not been disclosed.

4. Questions 3, 4, 5, 6 and 7 requested information regarding the financial impact upon Sprint Gateways resulting from implementation of the proposed rules, including projected costs of increased collection efforts, cash flow losses from nonpayment of 900 charges, increased bad debt expenses, revenue losses, and lost local exchange carrier access and billing and collection revenues, respectively. The disclosure of the requested proprietary information would invite customers to avoid payment of 900 charges, while providing Sprint Gateways' competitors with valuable, competitively sensitive information about Sprint Gateways' customers, services and financial data, including uncollectible accounts and revenues. Sprint Gateways' competitors could use the requested proprietary information to target particular customers and services, or to make critical decisions to enter or avoid particular markets.

WHEREFORE, Sprint Gateways respectfully requests the Commission to classify as confidential and proprietary the highlighted portions of US Sprint's responses to Staff Data Request Nos. 3, 4, 5, 6 and 7, and exempt such information from the provisions of Section 119.07(1), Florida Statutes. Sprint Gateways further respectfully requests that the Commission grant its Motion for a Permanent Protective Order in the manner and form requested by Sprint Gateways.

DATED: March 12, 1991

Respectfully submitted,
Sprint Gateways


CRAIG D. DINGWALL
General Attorney
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703/264-4968

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Sprint Gateways Responses to Staff's February 19, 1991 Data Requests Nos. 1-12 and Request for Confidential Classification and Motion for a Permanent Protective Order in Docket No. 91-00-60-TP has been served by U.S. Mail to the following parties of record on this 12th day of March 1991:

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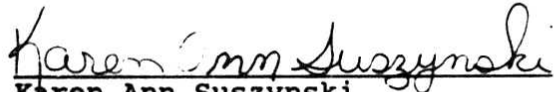
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