

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Consideration of BellSouth's  
Entry into InterLATA Services  
Pursuant to Section 271 of the Federal  
Telecommunications Act of 1996

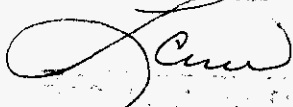
Docket No. 960786-TL  
Filed: October 1, 1997

**SPRINT AND SMNI'S REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF MELISSA CLOZ'S LATE-FILED EXHIBITS 91 AND 92**

Sprint Communications Company Limited Partnership ("Sprint") AND Sprint Metropolitan Networks, Inc. ("SMNI"), by and through their undersigned counsel, and pursuant to Section 364.183, Florida Statutes, and Commission Rules 25-22.006(4) and (5), Florida Administrative Code, file their request for confidential classification of portions of Late-Filed Hearing Exhibits 91 and 92 filed by Sprint/SMNI witness Melissa Cloz in this docket, and in support thereof state:

1. During the hearing, Commission Staff requested Ms. Cloz to provide Late-Filed Exhibits 91 and 92, which exhibits identify the types of Unbundled Network Elements (UNEs) ordered by SMNI and the number of business customers and subscriber lines in service by SMNI, and the number and types of interconnection trunks ordered by SMNI. Sprint and SMNI maintain that information contained in Late-Filed Exhibits 91 and 92 is confidential and proprietary.

2. Late-Filed Exhibit 91 identifies the types of UNEs ordered by SMNI. This information directly relates to SMNI's competitive interests. Disclosure of this information would impair SMNI's competitive business interests by allowing competitors to ascertain the precise configuration of SMNI's network of facilities

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and thus its relative cost structure. This information is intended to be and is treated by SMNI as proprietary and confidential.

3. Late-Filed Exhibit 91 also identifies the number of business customers and subscriber lines in service by SMNI. This information relates to SMNI's competitive interests. Disclosure of this information would impair SMNI's competitive business interests by allowing competitors to determine the number of customers and business lines in service by SMNI and, thus, its relative market penetration and corresponding revenues. This information is intended to be and is treated by SMNI as proprietary and confidential.

4. Late-Filed Exhibit 92 identifies the number and type of interconnection trunks ordered by SMNI. This information also relates to SMNI's competitive interests. Disclosure of this information would impair SMNI's competitive business interests by allowing competitors to determine the amount of traffic being transmitted over SMNI's network. This information too is intended to be and is treated by SMNI as proprietary and confidential.

5. Sprint and SMNI request that the information described in paragraphs 2 through 4 above be classified as "proprietary confidential business information" within the meaning of Section 364.183(3)(e), Florida Statutes. See Order No. PSC-97-1039-CFO-TL, issued September 2, 1997.

6. Sprint and SMNI file as Attachment "A" attached hereto a description of the confidential information contained in Late-Filed Exhibits 91 and 92.

7. Sprint and SMNI file as Attachment "B" attached hereto two copies of Late-Filed Exhibits 91 and 92 with the confidential information redacted.

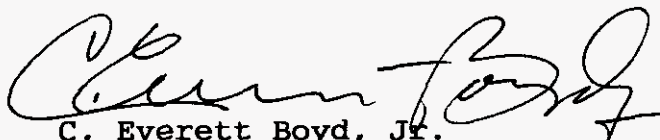
8. Sprint and SMNI file as Attachment "C" attached hereto one copy of Exhibits 91 and 92 with the specific information asserted to be confidential highlighted.

9. Sprint and SMNI request that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 364.183(4), Florida Statutes.

WHEREFORE, for the foregoing reasons, Sprint and SMNI respectfully request that its Request for Confidential Classification be granted.

DATED this 1st day of October, 1997.

Respectfully submitted,



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and  
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Attorneys for Sprint Communications  
Company Limited Partnership and  
Sprint Metropolitan Networks, Inc.

CERTIFICATE OF SERVICE

I CERTIFY that a copy of Sprint and SMNI's Request for Confidential Classification of Melissa Cloz's Late-Filed Exhibits 91 and 92, has been delivered by U.S. mail to Nancy White, c/o Nancy Sims, BellSouth Telecommunications, Inc., 150 South Monroe Street, Tallahassee, FL 32301, and a copy has been furnished by Hand Delivery or U.S. mail, this 1st day of October 1997, to:

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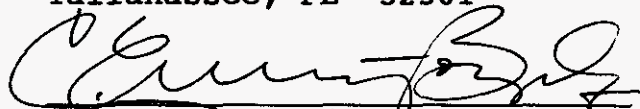
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## ATTACHMENT "A"

DOCKET NO. 960786-TL

### Late-Filed Exhibit 91

1. UNEs Ordered by SMNI

Exhibit 91 identifies 12 UNEs and indicates whether SMNI has ordered the particular UNE. The response to each UNE is confidential as described in paragraph 2 of the Request.

2. Number of Business Customers and Business Subscribers

Exhibit 91 identifies the number of business customers and number of subscriber lines utilized by those customers. The information is confidential as described in paragraph 3 of the Request.

### Late-Filed Exhibit 92

3. Number and Type of Interconnection Trunks

Exhibit 92 lists the number of one-way and two-way interconnection trunks ordered by SMNI. This information is confidential as described in paragraph 4 of the Request.

**ATTACHMENT "B"**

Sprint Communications Company  
Limited Partnership  
Docket No. 960786-TL  
Closz Late-Filed Hearing Exhibit  
September 15, 1997  
Item No. 92  
Page 1 of 1

**PROPRIETARY**

**REQUEST:** List the number and types of interconnection trunks ordered by Sprint or SMNI.

**RESPONSE:** Please see the attached proprietary information.

**INFORMATION PROVIDED BY:** Ms. Melissa Closz  
Director  
Local Market Development  
Sprint Communications  
151 Southhall Lane, Suite 400B  
Maitland, FL 32751

**PROPRIETARY/CONFIDENTIAL**

**UNEs Ordered by SMNI**

Local Loop Transmissions (loops)

Loop Distribution Media

Loop Cross Connect

Loop Concentration Systems

N.I.D.

Dedicated Transport

Common Transport

Tandem Switching

Unbundled Local Switching

Signalling Network Elements/AIN

OSS

Collocation

Number of Business Customers

Number of Business Subscriber Lines

Sprint Communications Company  
Limited Partnership  
Docket No. 960786-TL  
Closz Late-Filed Hearing Exhibit  
September 15, 1997  
Item No. 92  
Page 1 of 1

**PROPRIETARY**

**REQUEST:** List the number and types of interconnection trunks ordered by Sprint or SMNI.

**RESPONSE:** Please see the attached proprietary information.

**INFORMATION PROVIDED BY:** Ms. Melissa Closz  
Director  
Local Market Development  
Sprint Communications  
151 Southhall Lane, Suite 400B  
Maitland, FL 32751



Docket No. 960786-TL  
Late-Filed Hearing Exhibit No. 92  
September 15, 1997

**PROPRIETARY/CONFIDENTIAL**

**Number of Interconnection Trunks**

One-Way Trunks

Two-Way Trunks