



Monica M. Barone
20446

10000 Underwood Blvd
Atlanta, GA 30328
770.412.9999 ext. 225
Fax: 770.412.9174
http://www.sprint.com

October 19, 1998

Ms. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980459-TP – Flow Through of 1998 LEC Switched Access
Reductions By IXCs, Pursuant to Section 364.163(6), Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing in the above referenced docket, on behalf of Sprint Communications Company Limited Partnership ("Sprint"), an original and fifteen copies of Sprint's Request for Confidential Classification of Proprietary Data. In addition, a separate envelope containing the confidential version of the information is enclosed.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me.

Thank you for your assistance with this matter.

Very truly yours,

Monica M. Barone

cc: Sue Ollila, Division of Communications

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC
- WAS _____
- OTH _____

RECEIVED & FILED
OBG
FPSC-BUREAU OF RECORDS

MAIL ROOM
98 OCT 20 10 36
DOCUMENT NUMBER-DATE
71655 OCT 20 89
RECORDS & REPORTING

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: FLOW-THROUGH OF 1998 LEC
SWITCHED ACCESS REDUCTIONS BY
IXCS, PURSUANT TO SECTION
364.163(6) FLORIDA STATUTES

Docket No. 980459-TP
Filed: October 21, 1998

**REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF PROPRIETARY DATA
OF
SPRINT COMMUNICATIONS COMPANY LIMITED PARTNERSHIP**

Sprint Communications Company Limited Partnership ("Sprint") hereby requests confidential classification of certain data required by Order No. PSC-98-0795-FOF-TP issued in the above styled docket on June 9, 1998. The data constitutes proprietary confidential business information as defined in Section 364.183, Florida Statutes, and should therefore be afforded confidential classification pursuant to Rule 25-22.006, Florida Administrative Code. In support of this request, Sprint states as follows:

I. Summary of Confidential Information

In accordance with the requirements of Section 364.163(6), Florida Statutes and Order No. PSC-98-0795-FOF-TP, Sprint filed its detailed proprietary work papers for the 1998 switched access reductions. The work papers revealed the reduction amount effective July 1, 1998, and the projected amount for October 1, 1998. The work papers were assigned Document number 07797-98. Document number 07797-98 was returned to Sprint on September 16, 1998.

On October 1, 1998, Sprint filed its detailed proprietary work papers reflecting the access reductions effective July 1, 1998 and the actual reduction amount effective

DOCUMENT NUMBER-DATE

11655 OCT 20 98

FILED-REGDHD BY REPORTING

October 1, 1998. The work papers were assigned document number 10825-98. In response to staff's request, Sprint also filed document number 07797-98 for comparison purposes. Sprint filed a Notice of Intent to Request Confidential Classification along with the work papers.

Sprint requests the Commission to afford the information contained in document number 07797-98 and document number 10825-98 confidential classification. Both documents contain information that is intended to be and is treated by Sprint as private and has not been disclosed. They reflect calculations of Sprint's dollar and percentage reduction impact in intrastate switched access charges. Specifically, the documents reflect Sprint's related service-by-service dollar and percentage Florida intrastate rate reductions, accomplishing flow-through, in Sprint's Consumer Services Group and Business Services Group offerings

II. Justification for Confidential Classification

In accordance with Sections 350.121 and 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, the previously described information should be classified as confidential information and afforded protection from public disclosure. The material relates to the competitive activities of Sprint and provides specific information, not otherwise available to Sprint's competitors, regarding Sprint's intrastate traffic volumes. The information contained in documents 07797-98 and 10825-98 reflect on a service specific basis, total monthly intrastate revenues, Florida intrastate percentage figures, annualized revenues and access charges on a Florida intrastate and service specific basis. These calculations determine the total amount of flow-through required.

All of the information for which Sprint seeks confidential treatment falls within Section 364.183(e), which defines the term "proprietary confidential business information," to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information." The information contained in documents 07797-98 and 10825-98 is current and relates to a period during which the Florida intrastate interexchange market has been intensely competitive. Numerous carriers are entering the Florida market and existing carriers are increasing their marketing efforts in an attempt to attract customers. There is a multitude of new service offerings and marketing schemes being introduced. Public disclosure of the data contained in documents 07797-98 and 10825-98 would provide Sprint's competitors with information to determine the success or failure of Sprint's efforts in a given year. Sprint's competitors could then develop future marketing plans based on successes or failures of the past. Sprint, however, would not have access to this same information with respect to its competitors. Consequently, public disclosure of Sprint's information contained in documents 07798-98 and 10825-98 would give Sprint's competitors an unfair competitive advantage in the intrastate interexchange market in Florida. Based on the foregoing, the information contained in documents 07798-98 and 10825-98 constitutes proprietary confidential business information that must be protected from public disclosure pursuant to Section 365, 183, Florida Statutes.

III. Duration of Confidentiality

Due to the dynamic nature of competition in the State of Florida, Sprint is unable to provide a date certain by which the information filed in response to Order No. PSC-98-

0795-FOF-TP contained in documents 07798-98 and 10825-98 would no longer be proprietary and confidential.

IV. Return of Information

Sprint respectfully requests that this confidential information be returned to it after the Commission has verified compliance with Order No. PSC-98-0795-FOF-TP.

V. Conclusion

In accordance with the provisions of Rule 25-22.006, Florida Administrative Code, the requested information has been provided in two forms. Exhibit 1 is a copy of the information on which the proprietary information has been highlighted and is submitted in a separate sealed envelope labeled "CONFIDENTIAL". The information contained in Exhibit 1 is the same information contained in what has been previously identified as document number 07797-98 and document number 10825-98. This version, which contains the complete information, should be classified as confidential information for the reasons set forth above. Exhibit 2 is a redacted version, which contains the information in non-proprietary form.

Respectfully submitted this 19th day of October 1998.

Sprint Communications Company
Limited Partnership



Monica M. Barone
Sprint
Mailstop GAATLN0802
3100 Cumberland Circle
Atlanta, GA 30399

EXHIBIT 2

(PREVIOUSLY IDENTIFIED AS DN 07797-98)

IXC FLOW-THROUGH WORKSHEET

Florida

Name of IXC: **Sprint**
 Study Period: **Jan 1998 through April 1998 Annualized**

Calculation of \$ Savings & Percent Reduction:

LEC	Jan - April Access MOU Annualized	Rate Change	July 1, 1998 Annual Switched Access Savings	Estimated 10/1/98 Switched Access Savings	Combined 1998 Reductions
1. GTE	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
2. GTE Total GTE	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
3. Sprint-LTD	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
4. Total Sw. Access Savings	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
5. Statewide intrastate long distance study period billable revenue	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
6. Required % reduction in IXC's FL intrastate long distance rates:			\$ [REDACTED]	\$ [REDACTED]	[REDACTED]

SPRINT
 Proprietary Information
HIGHLY RESTRICTED

Florida - Access Flow Through Reductions

LEC Annual Access Reductions:

Sprint - Local
GTE
Total Flow Thru Amount

	July 1, 1998	October 1, 1998
5% Reduction	[REDACTED]	Estimated 10% Reduction
Total	[REDACTED]	[REDACTED]

Sprint's Total Annual Flow Thru:

Residential Annual Flow Thru:
Business Annual Flow Thru:
Wholesale Annual Flow Thru:

REVENUE
\$ [REDACTED]
\$ [REDACTED]
\$ [REDACTED]
\$ [REDACTED]

Residential Products:

MTS
Sprint Sense AnyTime ⁽¹⁾
Total Residential

Business Products:

Business MTS
Business Sense
The Most for Business
Hospitality Connection
VPN/VPN Premiere
Real Solutions Annual ⁽²⁾
Sprint Clarity ⁽³⁾
Total Business

Wholesale Products

Resale Solutions
Total Company

Monthly MOU	MONTHLY REVENUE		Flow Thru	Revenue Reductions Thru September 1998		PERCENT REDUCTION
	Current	Proposed		Current	Proposed	
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]

Notes:
 (1) Service Migration - Sprint Sense to Sprint Sense AnyTime
 (2) Service Migration - Real Solutions Option A and Sprint Clarity to Real Solutions Annual
 (3) 20% Promotional Rate Discount

**IXC Summary
Florida**

IXC: Sprint

Effective Date of Flow through: July 1, 1998 and October 1, 1998

SPRINT
Proprietary Information
HIGHLY RESTRICTED

- 1. IntraLATA Toll Rate % Reduction
 - a. Total IntraLATA Dollar Reduction ⁽¹⁾
 - b. Total IntraLATA Revenue ⁽²⁾
 - c. Percent Reduction

\$ [REDACTED]
\$ [REDACTED]

Current and Proposed rates for the following services are the same for IntraLATA and InterLATA:

	Current Monthly Revenue	Proposed Monthly Revenue	Monthly Reduction	Percent Reduction
The Most for Business	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Hospitality Connection	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
VPN/VPN Premiere	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Real Solutions Annual ⁽²⁾	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Resale Solutions	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

(1) May 1998 IntraLATA billable revenue / Total IntraLATA billable revenue * Total monthly reduction for services with IntraLATA rate reductions * 12.

(2) May 1998 IntraLATA billable revenue annualized.

EXHIBIT 2

(PREVIOUSLY IDENTIFIED AS DN 10825-98)

Sprint
Proprietary Information - Highly Restricted

DC Summary
Florida Access Flow Through Reductions

	MONTHLY REVENUE				Revenue Through September 30, 1999			
	Pre July 1, 1998 Avg. Rate/MOU	Est. Post Jul. 1, 1998 Avg. Rate/MOU	Actual Post Jul. 1, 1998 Avg. Rate/MOU	Actual Customer MOU	Current Revenue Pre 7/1/98	Current Revenue After 7/1/98	Flow Through Amount	Flow Through Amount

Residential Products:

MTS (Sprint Service) [REDACTED]
 Sprint Service AnyTime (1X2) [REDACTED]
 Total Residential [REDACTED]

Business Products:

Business MTS [REDACTED]
 Business Sense [REDACTED]
 The Most for Business [REDACTED]
 Hospitality Connection [REDACTED]
 VPN/VPN Premiums [REDACTED]
 Real Solutions Annual [REDACTED]
 Sprint Clarity [REDACTED]
 Total Business [REDACTED]

Wholesale Products:

Resale Solutions [REDACTED]
 Total Company [REDACTED]

Notes:

(1) Migration of Sprint Service to Sprint Service AnyTime. Change in actual rate per minute effective October 1, 1998 attributed to actual revenue and minutes in addition to recent Sprint Service AnyTime changes - up to 30 free minutes per month and up to 30 short calls (30 seconds or less) free per month.

(2) Actuals for Real Solutions based on July 1998 data - one (1) month of migration. Lower conversion as of July 31, 1998 attributed to lower rates volumes during summer months and average Business Product selling cycle of two to three months.

(3) Monthly revenue before migration re-calculated using actual MOU

SPRINT
 Proprietary Information
HIGHLY RESTRICTED

IXC FLOW-THROUGH WORKSHEET
Florida

Name of IXC: Sprint

Calculation of \$ Savings & Percent Reduction:

LEC	Jan - April Access MOU Annualized	July 1, 1998 Rate Change	July 1, 1998 Annual Switched Access Savings	Annualized MOU*	October 1, 1998 Rate Change	Actual 10/1/98 Switched Access Savings	Combined 1998 Reductions
1. GTE	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
2. GTE	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
Total GTE	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
3. Sprint-LTD	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
4. Total Sw. Access Savings	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
5. Statewide intrastate long distance study period billable revenue	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
6. Required % reduction in IXC's FL intrastate long distance rates:	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]

* MOU Provided by GTE and Sprint LTD

SPRINT
Proprietary Information
HIGHLY RESTRICTED

Sprint - Proprietary
Highly Restricted

Florida - Access Flow Through Reductions

	July 1, 1998	October 1, 1998	Total
LEC Annual Access Reductions:		Estimated 10% Reduction	
Sprint - Local	[REDACTED]	[REDACTED]	[REDACTED]
GTE	[REDACTED]	[REDACTED]	[REDACTED]
Total Flow Thru Amount	[REDACTED]	[REDACTED]	[REDACTED]

Sprint's Total Annual Flow Thru:

Residential Annual Flow Thru:	\$ [REDACTED]
Business Annual Flow Thru:	\$ [REDACTED]
Wholesale Annual Flow Thru:	\$ [REDACTED]

Monthly MOU	MONTHLY REVENUE		Revenue Reductions Thru September 1998		PERCENT REDUCTION
	Current	Proposed	Current	Proposed	
Residential Products:					
MTS	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Sprint Sense AnyTime ⁽¹⁾	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Total Residential	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Business Products:					
Business MTS	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Business Sense	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
The Most for Business	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Hospitality Connection	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
VPN/VPN Premiers	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Real Solutions Annual ⁽²⁾	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Sprint Clarity ⁽³⁾	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Total Business	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Wholesale Products					
Resale Solutions	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]
Total Company	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]

Notes:
⁽¹⁾ Service Migration - Sprint Sense to Sprint Sense AnyTime
⁽²⁾ Service Migration - Real Solutions Option A and Sprint Clarity to Real Solutions Annual
⁽³⁾ 20% Promotional Rate Discount

IXC FLOW-THROUGH WORKSHEET

Florida

Name of IXC: **Sprint**
 Study Period: **Jan 1998 through April 1998 Annualized**

Calculation of \$ Savings & Percent Reduction:

LEC	Jan - April Access MOU Annualized	Rate Change	July 1, 1998 Annual Switched Access Savings	Estimated 10/1/98 Switched Access Savings	Combined 1998 Reductions
1. GTE	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
2. GTE	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
Total GTE		\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
3. Sprint-LTD	[REDACTED]	\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
4. Total Sw. Access Savings		\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
5. Statewide intrastate long distance study period billable revenue		\$ [REDACTED]	\$ [REDACTED]	[REDACTED]	[REDACTED]
6. Required % reduction in IXC's FL intrastate long distance rates:			\$ [REDACTED]	\$ [REDACTED]	[REDACTED]

SPRINT
 Proprietary Information
HIGHLY RESTRICTED

**IXC Summary
Florida**

IXC: Sprint

Effective Date of Flow through: July 1, 1998 and October 1, 1998

SPRINT
Proprietary Information
HIGHLY RESTRICTED

- 1. IntraLATA Toll Rate % Reduction
 - a. Total IntraLATA Dollar Reduction ⁽¹⁾ \$ [REDACTED]
 - b. Total IntraLATA Revenue ⁽²⁾ \$ [REDACTED]
 - c. Percent Reduction

Current and Proposed rates for the following services are the same for IntraLATA and InterLATA:

	Current Monthly Revenue	Proposed Monthly Revenue	Monthly Reduction	Percent Reduction
The Most for Business	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Hospitality Connection	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
VPN/VPN Premiere	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Real Solutions Annual ⁽²⁾	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Resale Solutions	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

(1) May 1998 IntraLATA billable revenue / Total IntraLATA billable revenue * Total monthly reduction for services with IntraLATA rate reductions * 12.

(2) May 1998 IntraLATA billable revenue annualized.