

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

Complaint of Sprint-Florida,
Incorporated Regarding the Practices
Of Thrifty Call, Inc. in the reporting of
Percent Interstate Usage for
Compensation for Access Services.

Filed: November 22, 1999

Docket No.

991751-TP

Thrifty

**SPRINT'S REQUEST FOR CONFIDENTIAL CLASSIFICATION PURSUANT
TO SECTION 364.183(1), FLORIDA STATUTES**

1. Sprint-Florida, Incorporated (Sprint) 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. The information that is the subject of this request is customer account record information contained in the Complaint filed in this docket and certain exhibits attached thereto.

2. The following documents or portions of documents are the subject of this request:

- 1. Portions of paragraphs 1, 2,6,8,9,10,11,16, and 17 of the Complaint.
- 2. Exhibit 1.
- 3. Portions of Exhibit 2.
- 4. Exhibit 3.
- 5. Exhibit 4.
- 6. Portions of Exhibit 6.
- 8. Portions of Exhibit 7.

This request for confidentiality was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. ~~4420-99~~. No ruling is required unless the material is subject to a request per 119.07, FS, or has been admitted into the record per Rule 25-22.006(8)(b), FAC.

3. One unredacted copy of the documents has been submitted to the Division of Records and Reporting under seal this same day.

4. Yellow highlighting identifies the confidential information. The information for which the Request is submitted is information from customer account records of certain interexchange carriers. (or is information from which such information can be derived) and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(a)(d) & (e) and 364.24, Florida Statutes.

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5. Section 364.183(3), 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.

6. Furthermore, Section 364.24, Florida Statutes, provides that customer account records shall not be [publicly] disclosed.

7. The subject information has not been publicly released and Sprint is required by law to keep the information confidential. The commission has found similar information to be confidential. See, *In re: Discovery related to study on fair and reasonable rates and on relationships among costs and charges associated with certain telecommunication services provided by local exchange companies (LECs), as required by Chapter 98-277, Laws of Florida*. Docket No. 980733-TL; Order No. PSC-99-0378-CFO-TL, Florida Public Service Commission; 1999 Fla. PUC LEXIS 373; 99 FPSC 2:440, February 22, 1999.

WHEREFORE, 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 22nd day November 1999.



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