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VIA HAND DELIVERY

RECORDS AND
REPORTING

September 11, 2000

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

Re: Sprint's Notice and Claim of Confidentiality Pursuant to Section 364.183(1),
Florida Statutes for Exhibit RAW-1 to Direct Testimony of Richard A. Warner filed
September 8, 2000 Docket No. 000636-TP

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of Sprint's Notice and Claim of
Confidentiality Pursuant to Section 364.183(1), Florida Statutes for Exhibit RAW-1 to
Direct Testimony of Richard A. Warner filed on September 8, 2000 in Docket No. 000636-TP.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of
this letter and returning the same to this writer.

Sincerely,

Susan S. Masterton

Enclosure

This confidentiality request was filed by or
for a "telco" for DN 11243-00 No ruling
is required unless the material is subject to a
request per 119.07, FS, or is admitted in the
record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE

11242 SEP 11 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for arbitration
concerning complaint of Sprint
Communications Limited
Partnership against BellSouth
Telecommunications, Inc.
regarding failure to comply with
interconnection agreement.

Filed: September 11, 2000

Docket No. 000636-TP

Sprint's Request for Confidential Classification Pursuant to Section
364.183(1), Florida Statutes

Sprint Communications Company Limited Partnership (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 contained in the Direct Testimony of Richard Warner filed in this Docket.

1. The following documents or excerpts from documents are the subject of this request:

(a) Exhibit RAW-1 To the Direct Testimony of Richard Warner
filed in this Docket on September 8, 2000.

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

3. The confidential information is identified by yellow highlighting. The information for which the Request is submitted is billing information (or information from which such information can be derived), trade secret

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

and other highly proprietary contractual, competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(a)(d) & (e), Florida Statutes. 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.

4. Furthermore, Section 688.002(4), Florida Statutes is instructive on what constitutes a trade secret and provides that:

(4) "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process that:

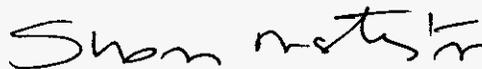
- (a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and
- (b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

5. The subject information has not been publicly released. Furthermore, release of the information could impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, thus causing harm to the company's business operations.

6. The commission has found similar information to be confidential in this docket. See, Order No. PSC-00-1346-CFO-TP, Issued July 26, 2000.

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 11th day of September, 2000.



Charles J. Rehwinkel
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MS: FLTLHOO 107
Tallahassee, Florida 32316
850/847-0244

CERTIFICATE OF SERVICE

Docket No. 000636-TP

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (*) this 11th day of September, 2000, to the following:

Mr. Timothy Vaccaro
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy B. White
c/o Nancy H. Sims
BellSouth Telecommunications
150 S. Monroe St., Suite 400
Tallahassee, FL 32301-1556

Michael P. Goggin
BellSouth Telecommunications, Inc.
150 West Flagler Street, Suite 1910
Miami, Florida 33130



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