

ORIGINAL



Susan S. Masterton  
Attorney

Law/External Affairs  
Post Office Box 2214  
1313 Blair Stone Road  
Tallahassee, FL 32316-2214  
Mailstop FLTLHO0107  
Voice 850 599 1560  
Fax 850 878 0777  
susan.masterton@mail.sprint.com

January 11, 2002

Ms. Blanca Bayo', Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED - FPSC  
02 JAN 11 PM 4:34  
COMMISSION  
CLERK

RE: Docket No. 010795-TP; Sprint Communications Company Limited Partnership's  
Notice of Service of Supplemental Responses to Verizon's First Set of  
Interrogatories

Dear Ms. Bayo':

Enclosed for filing are the original and 5 copies of Sprint Communications Company  
Limited Partnership's (Sprint's) Notice of Service of Responses to Verizon's First Set of  
Interrogatories and the original and 15 copies of Sprint's Request for Confidential  
Classification. Copies are being served on the parties in this docket, pursuant to the  
attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter  
and returning same to the courier. If you have any questions, please do not hesitate to  
call me at 850/599-1560.

Sincerely,

*Susan S. Masterton*

Susan S. Masterton

Enclosures

APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
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PAI \_\_\_\_\_  
RGO \_\_\_\_\_  
SEC \_\_\_\_\_  
SER \_\_\_\_\_  
OTH \_\_\_\_\_

RECEIVED & FILED

*Richard*  
FPSC-BUREAU OF RECORDS

Notice of Service  
DOCUMENT NUMBER - DATE  
00445 JAN 11 08  
Request  
DOCUMENT NUMBER - DATE  
00446 JAN 11 08

Confidential  
DOCUMENT NUMBER - DATE  
00447 JAN 11 08  
FPSC-COMMISSION CLERK

FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Investigation into )  
Pricing of unbundled network )  
Elements )

Docket No. 010795-TP

Filed: January 11, 2002

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02 JAN 11 PM 4:35  
COMMISSION  
CLERK

**Sprint's Request for Confidential Classification**

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 Sprint's Supplemental Response to Verizon's First Set of Interrogatories.

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

**Sprint's Supplemental Response to Verizon's First Set of Interrogatories, Response to Interrogatory No. 21.**

2. One unredacted copy of the documents has been submitted to the Division of Records and Reporting under seal this same day. Attached to this request are two redacted copies of the document.

3. The confidential information is identified by yellow highlighting. The information for which the Request is submitted is highly proprietary competitive information and thus

This confidentiality request was filed by or for a "telco" for DN ~~00447-02~~ 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

00446 JAN 11 8

FPSC-COMMISSION CLERK

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.

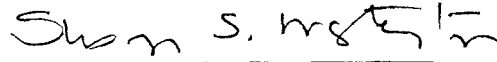
(f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

4. Sprint has treated and intends to treat the subject information as private and this information has not been publicly disclosed. Furthermore, release of the information is sensitive competitive information and disclosure of such information could cause harm to the company's competitive business interests.

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.

RESPECTFULLY SUBMITTED this 11th day of January 2002.



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Susan S. Masterton  
Post Office Box 2214  
MS: FLTLHO0107  
Tallahassee, Florida 32316  
850/599-1560

ATTORNEY FOR SPRINT

What are Sprint's estimates or forecasts regarding the percentage of traffic for those customers that subscribe to VAD service that will terminate inside the originating caller's local calling area and that will terminate outside the originating caller's local calling area, respectively?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

What are Sprint's estimates or forecasts regarding the percentage of traffic for those customers that subscribe to VAD service that will terminate inside the originating caller's local calling area and that will terminate outside the originating caller's local calling area, respectively?

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

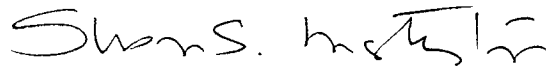
**CERTIFICATE OF SERVICE  
DOCKET NO. 010795-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery\*, facsimile and overnight mail\*\* this 11<sup>th</sup> day of January, 2002 to the following:

Kimberly Caswell \*\* (Non-Redacted)  
Verizon Florida, Inc.  
201 N. Franklin Street, FLTC0007  
One Tampa City Center  
Tampa, FL 33602

Kelly Faglioni \*\* (Non-Redacted)  
Meredith B. Miles  
Hunton & Williams  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, VA 23219

Adam Teitzman \* (Redacted)  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850



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Susan S. Masterton