

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into)
Appropriate Methods to)
Compensate Carriers for)
Exchange of Traffic Subject to)
Section 251 of the)
Telecommunications Act of 1996)
_____)

DOCKET NO. 000075-TP (Phase IIA)

Filed: April 16, 2002

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

Sprint-Florida, Incorporated and Sprint Communications Company Limited Partnership (hereinafter "Sprint") hereby request 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 highly sensitive competitive information. The information has been filed, under seal, with the Division of Records and Reporting in response to Staff's First Request for Production of Documents.

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

Highlighted portions of Attachments 1, 6, 7, 8, and 9 of Sprint's Response to Staff's First Request for Production of Documents (No.1)

2. Unredacted copies of the documents have been submitted to the Division of Records and Reporting under seal this same day. The confidential information is identified by

This confidentiality request was filed by or for a "telco" for DN 04252-02. 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.

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yellow highlighting. Two redacted copies of the information are attached to this request.

3. The information for which the Request is submitted is highly proprietary competitive information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(e), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment A.

4. 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:

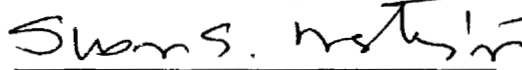
- (a) Trade Secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods 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.

5. The subject information has not been publicly released. Furthermore, release of the information could cause harm to Sprint's competitive interests and impair Sprint's competitive business.

6. The commission has previously found information similar in character to be confidential. See, Order No. PSC-99-0378-CFO-TL, Order No. 97-0795-CFO-TL and Order No. 95-0252-CFO-TP.

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 16th day of April 2002.



Susan S. Masterton
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ATTORNEY FOR SPRINT

ATTACHMENT A

Attachment to POD No. 1 Treated as proprietary	Justification for Confidential Treatment
Attachment #1	Document contains sensitive Sprint intraLATA toll revenue data relating to Sprint's position in the intraLATA toll market. Allowing competitors access to this information would impair Sprint's competitive business interests and unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Attachment #6	Document contains sensitive Sprint intraLATA toll revenue data relating to Sprint's position in the intraLATA toll market. Allowing competitors access to this information would impair Sprint's competitive business interests and unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Attachment #7	Document contains sensitive Sprint intraLATA toll revenue data relating to Sprint's position in the intraLATA toll market. Allowing competitors access to this information would impair Sprint's competitive business interests and unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Attachment #8	Document contains sensitive Sprint intraLATA toll revenue data relating to Sprint's position in the intraLATA toll market. Allowing competitors access to this information would impair Sprint's competitive business interests and unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.
Attachment #9	Document contains sensitive Sprint intraLATA toll revenue data relating to Sprint's position in the intraLATA toll market. Allowing competitors access to this information would impair Sprint's competitive business interests and unfairly advantage competitors by allowing them to develop marketing and pricing plans without incurring the time and expense that a competitor would otherwise have to expend.

CERTIFICATE OF SERVICE
DOCKET NO. 000075-TP (Phase II)

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery* or U.S. Mail this 16th day of April, 2002 to the following:

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