

ORIGINAL



Susan S. Masterton  
Attorney

Law/External Affairs  
Post Office Box 2214  
1313 Blair Stone Road  
Tallahassee, FL 32316-2214  
Mailstop FLTLH00107  
Voice 850 599 1560  
Fax 850 878 0777  
susan.masterton@mail.sprint.com

March 14, 2003

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED  
COMMISSION CLERK  
MAR 14 PM 4:47  
OSD: CLEVER

Re: Docket No. 981834-TP & 990321-TP

Dear Ms. Bayó:

Enclosed for Filing on behalf of Sprint are the original and one copy of

1. Sprint's Notice of Service of Responses to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (No. 1-22) and First Request for First Set of Interrogatories (No. 1-4)
2. Sprint's Claim of Confidentiality.

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*

AUS \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMP \_\_\_\_\_  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
 ECR \_\_\_\_\_  
 GCL \_\_\_\_\_  
 OPC \_\_\_\_\_  
 MMS \_\_\_\_\_  
 SEC \_\_\_\_\_  
 OTH \_\_\_\_\_

Susan S. Masterton  
 Enclosure

RECEIVED & FILED  
 Notice of Service  
 MARGUERITE - CLAIM  
 FPSC-BUREAU OF RECORDS

*Confidential*  
 DOCUMENT NUMBER-DATE  
 02514 MAR 14 8  
 FPSC-COMMISSION CLERK

*Notice of Service Claim*  
 DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE  
 02512 MAR 14 8 02513 MAR 14 8  
 FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail or Hand Delivery\* this 14th day of March, 2003 to the following:

Wayne Knight, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

FCCA  
c/o McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, Florida 32301

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

Ausley Law Firm  
Jeff Wahlen  
Post Office Box 391  
Tallahassee, Florida 32302

Alltel Communications Services, Inc.  
Bettye Willis  
One Allied Drive  
Little Rock, AR 72203-2177

MCI WorldCom Communications, Inc.  
Donna McNulty  
1203 Governors Square Blvd. Suite 201  
Tallahassee, Florida 32301-2960

Hopping Law Firm  
Rick Melson  
Post Office Box 6526  
Tallahassee, Florida 32314

Messer Law Firm  
Floyd Self/Norman Horton  
Post Office Box 1876  
Tallahassee, Florida 32302

Pennington Law Firm  
Peter Dunbar/Marc W. Dunbar  
Post Office Box 1009  
Tallahassee, Florida 32302

MediaOne Florida Telecommunications,  
Inc.  
c/o Laura L. Gallagher, P.A.  
101 E. College Ave., Suite 302  
Tallahassee, Florida 32301

Florida Cable Telecommunications  
Association, Incorporated  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

AT&T Communications of the \*  
Southern States, Inc.  
Tracy W. Hatch  
215 South Monroe Street  
Tallahassee, Florida 32301

Time Warner Telecom  
Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069

Katz, Kutter Law Firm  
Charles Pellegrini/Patrick Wiggins  
12<sup>th</sup> Floor  
106 East College Avenue  
Tallahassee, Florida 32301

Supra Telecommunications &  
Information Systems, Inc.  
Mark E. Buechele  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133

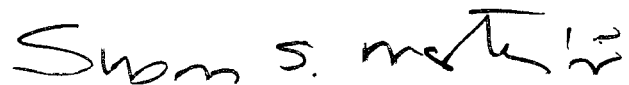
Verizon-Florida, Incorporated  
Michelle Robinson  
P.O. Box 110, FLTC0007  
Tampa, FL 33601-0110

ITC^DeltaCom Communications, Inc.  
Nanette Edwards  
Messer, Caparello & Self  
Post Office Box 1876  
Tallahassee, Florida 32302-1876

Network Telephone Corporation  
Brent E. McMahan  
815 South Palafox Street  
Pensacola, FL 32501-5937

KMC Telecom, Inc.  
Mr. John D. McLaughlin, Jr.  
1755 North Brown Road  
Lawrenceville, GA 30043-8119

Florida Digital Network, Inc.  
Matthew Feil, Esq.  
390 North Orange Ave., Suite 2000  
Orlando, FL 32801



Susan S. Masterton

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for  
Commission action to support local  
competition in BellSouth  
Telecommunications, Inc.'s service territory.

---

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated  
Connections, Inc. for generic investigation to  
ensure that BellSouth Telecommunications,  
Inc., Sprint-Florida, Incorporated, and GTE  
Florida Incorporated comply with obligation to  
provide alternative local exchange carriers  
with flexible, timely, and cost-efficient  
physical collocation.

---

DOCKET NO. 990321-TP

Filed: March 14, 2003

**Sprint's Claim of Confidentiality**

Sprint-Florida, Incorporated ("Sprint") gives notice that it claims certain documents and/or records identified herein to be confidential. The information is proprietary business information concerning Sprint's costs, including vendor-pricing information the disclosure of which could harm Sprint's competitive business interests or impair Sprint's ability to contract for goods and services on favorable terms.

The information that is the subject of this Notice has been provided only because of and pursuant to a requirement of the Florida Public Service Commission, specifically a requirement in the procedural order in this docket, Order No. PSC-02-1513-PCO-TO, that discovery responses to all parties, including requests for production of documents be served on Commission staff at the same time the responses are served on the requesting party. Therefore, to the extent that Sprint claims that the information is confidential, the

DOCUMENT NUMBER-DATE

02513 MAR 14 8

FPSC-COMMISSION CLERK

information is deemed confidential by operation of law. See, Section 364.183 (1), F.S. Provisions of FPSC Rule 25-22.006, F.A.C., to the contrary do not apply to this information, unless and until such information is entered into the record of this docket, in which case Sprint will file a Request for Confidentiality pursuant to the rule.

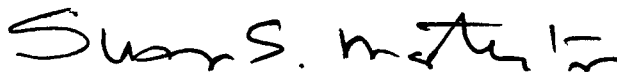
The following record is the subject of this request:

**Responses to AT&T's First Request for Production of Documents Nos. 9, 14 & 22.**

Copies of the documents that are the subject of this request are being filed with the Commission Clerk under separate cover this same day.

This Notice requires that the information be treated as confidential while on file at the Florida Public Service Commission or in the possession of staff or staff's witnesses and further that the information be returned as required by Section 364.183, F.S.

Respectfully submitted this 14th day of March 2003.



Susan S. Masterton  
Sprint  
P.O. Box 2214  
Tallahassee, FL 32316-2214  
850-599-1560

ATTORNEY FOR SPRINT