



ORIGINAL

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August 5, 2003

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

RECEIVED-FPSC  
03 AUG -5 PM 4: 56  
COMMISSION  
CLERK

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

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the original and fifteen copies of Sprint's Request for Confidential Classification pursuant to Section 364.183(1), Florida Statutes.

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,

RECEIVED & FILED  
*th*  
FPSC-BUREAU OF RECORDS

Susan S. Masterton

Enclosures

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL 1
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC 1
- OTH \_\_\_\_\_

*cc: cont records*

DOCUMENT NUMBER-DATE

07153 AUG -5 03

FPSC-COMMISSION CLERK

**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.

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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.

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DOCKET NO. 990321-TP

Filed: August 5, 2003

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

Sprint-Florida, Incorporated (hereinafter "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. Sprint previously filed a Notice of Intent to Request Confidential Classification on July 14, 2003 for this information and now files this Request for Confidential Classification pursuant to the requirements of Rule 25-22.006, F.A.C.

The information that is the subject of this request is information relating to the competitive interests of Sprint and employee personnel information. The information has been filed, under seal, with the Division of Records and Reporting.

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

DOCUMENT NUMBER-DATE

07153 AUG-5 8

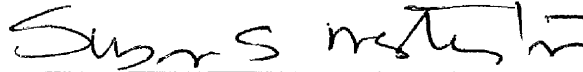
**Highlighted portions of Sprint's Responses to Staff's Interrogatories Nos. 57, 58 & 62 and Sprint's Responses to Staff's PODs Nos. 49 & 54**

2. Two redacted copies of the Responses are attached to this request. One highlighted unredacted copy of the confidential information is being filed separately under seal with the Division of Records and Reporting on this same day.
3. The information for which the Request is submitted is information relating to the competitive interests of Sprint, the disclosure of which would impair Sprint's competitive business, and employee personnel information. Specific justification for confidential treatment is set forth in Attachment A.
4. Section 364.183(3), F.S., 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 impair the company's competitive business interests or intrude on the privacy interests of company employees.

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 5th day of August 2003.



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

ATTORNEY FOR SPRINT

**ATTACHMENT A**

Document and page and line numbers	Justification for Confidential Treatment
Intrg.. No. 57 Highlighted information in response to a. and c.	Contains competitively sensitive information relating to Sprint's deployment of packet switching technology, disclosure of which will impair Sprint's competitive business interests.
Intrg.. No. 58 Highlighted information in line 1 of response	Contains competitively sensitive information relating to Sprint's deployment of packet switching technology, disclosure of which will impair Sprint's competitive business interests.
Intrg. No. 62 Highlighted information in line 5 of response	Contains competitively sensitive information relating to Sprint's deployment of packet switching technology, disclosure of which will impair Sprint's competitive business interests.
POD No. 49, Supervision costs, page 1 of 3, columns 7 & 9, lines 1-60 & page 2 of 3, column 4, lines 1-57	Contains employee personnel identifying information the disclosure of which will impair the privacy interests of the employees.
POD No. 54, page 1 of 1, lines 5-9, 14-18, 23-26, and 28, columns 1-3, 5-11 and 13-18.	Contains competitively sensitive information relating to Sprint's deployment of packet switching technology, disclosure of which will impair Sprint's competitive business interests.

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by hand delivery (\*), electronic mail & U.S. mail this 5th day of August, 2003 to the following:

Adam Teitzman, Staff Counsel (\*)  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

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

Pennington Law Firm  
Peter Dunbar/Marc W. Dunbar  
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Tallahassee, Florida 32302

Florida Cable Telecommunications  
Association, Incorporated  
Michael A. Gross  
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Tallahassee, FL 32303

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

MCI WorldCom Communications, Inc.  
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Messer Law Firm  
Floyd Self/Norman Horton  
Post Office Box 1876  
Tallahassee, Florida 32302

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

AT&T Communications of the  
Southern States, Inc.  
Tracy W. Hatch  
101 North Monroe Street, Suite 700  
Tallahassee, Florida 32301-1549

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  
Richard Chapkis  
c/o David Christian  
106 East College Avenue, Suite 810  
Tallahassee, Florida 32301-7704

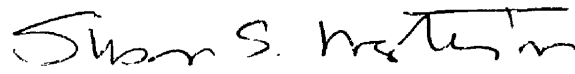
ITC^DeltaCom Communications, Inc.  
Nanette Edwards  
Messer, Caparello & Self  
Post Office Box 1876  
Tallahassee, Florida 32302-1876

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

KMC Telecom, Inc.  
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Susan S. Masterton