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November 17, 2003

BY HAND DELIVERY

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

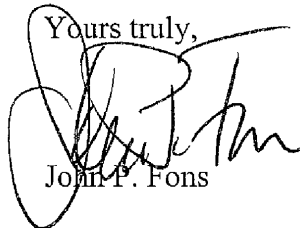
Re: Docket No. 030868-TL

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint's Request for Confidential Classification and Protective Order Pursuant to Section 364.183(1), Florida Statutes.

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

Thank you for your assistance in this matter.

Yours truly,

John P. Fons

Enclosures

cc: Certificate of Service List

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DOCUMENT NUMBER-DATE

11532 NOV 17 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: SPRINT-FLORIDA, INCORPORATED'S
PETITION TO REDUCE INTRASTATE
SWITCHED NETWORK ACCESS RATES TO
INTERSTATE PARITY IN A REVENUE
NEUTRAL MANNER PURSUANT TO
SECTION 364.164(1), FLORIDA STATUTES

DOCKET NO.: 030868-TL
FILED: November 17, 2003

**SPRINT'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND PROTECTIVE ORDER
PURSUANT TO SECTION 364.183(1), FLORIDA STATUTES**

On October 27, 2003, Sprint-Florida, Incorporated ("Sprint") filed its Notice of Intent to Request Confidential Classification. 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 a protective order reflecting such decision and protecting the information in the possession of the Commission and the Office of the Public Counsel. The information that is the subject of this request is contained in certain documents contained in Sprint's Response to Request No. 6 of Citizens' First Request for Production of Documents served on the Office of Public Counsel and the Commission on October 27, 2003.

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

- a. **Sprint's Supplemental Response to Citizens' POD No. 6**
- **Sprint Corporation "Maximus" document consisting of 12 pages**

2. One Unredacted copy of the information has been submitted to the Division of Records and Reporting under seal this same day. The confidential information is identified by gray highlighting. Two redacted copies of the information are attached to this request.

3. The information for which the Request is submitted is trade secret or other highly proprietary competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3), 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. 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:

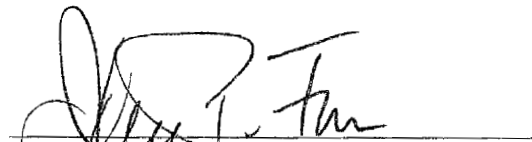
(a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use;
and

(b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

6. The subject information has not been publicly released. Furthermore, release of the information could impair the company's ability to compete for, or negotiate with, certain business customers.

WHEREFORE, based on the foregoing, Sprint respectfully requests that the Commission grant Sprint's Request for Confidential Classification, exempt the information from disclosure under Chapter 119, Florida Statutes and issue a protective order, protecting the information from disclosure while it is maintained at the Commission and in the possession of the Office of the Public Counsel.

RESPECTFULLY SUBMITTED this 17th day of November, 2003.



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ATTORNEYS FOR SPRINT-FLORIDA,
INCORPORATED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail, e-mail or hand delivery (*) this 17th day of November, 2003, to the following:

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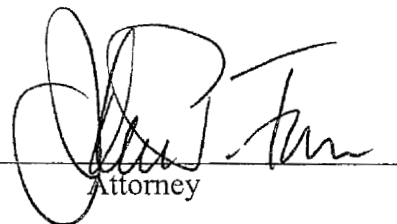
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Attorney

ATTACHMENT A

Document and Page and Line Numbers	Justification for Confidential Treatment
<p>a. Sprint's Supplemental Response to Citizens' 1st Request for Production of Documents No. 6, Sprint Corporation "Maximus" document</p> <ul style="list-style-type: none"> - Pages 1 through 3 of 12, Column B, lines 7-16, 9-23, 25, 27, 29, 31, 33, 35, 37, 39, 41, 43, 45, 48-51, 54-58, 61-65, 67, 69, 71, 76-78, 79-81, 83, 84, 87, 89, 91, 93, 95, 97, 99, 101, 103, 105, 107-111, 113-118, 121-125, 127, 129, 131, 133, 136-142, 144, 145, 148, 150, 153-156, 159-163, 166-169, 171, 173, 175, 177-184, 188, 190, 192, 194, 198, 200, 202, 204, 207, 208, 210, 212, 214, 219, 221, 223, 225 - Pages 4 through 8 of 12, Column B, lines 7-10, 13-16, 18, 23-27, 29-34, 37, 41, 42, 45, 46, 48-51, 54-59, 61, 62, 65-70, 72-74, 76, 79-82, 85-92, 94, 96, 99-102, 105-108, 111-118, 120, 122, 134-137, 140-149, 151, 156-159, 162-167, 171, 173, 177-180, 183-190, 192, 194, 196-198, 202-208, 212-218, 221-228, 230, 231, 236, 237, 240, 245-248, 251-260, 264-267, 270-277, 279, 283-286, 289-296, 298, 301, 304-306, 309-311, 313, 314, 317-319, 321, 324-326, 329-331, 335-338, 340, 343-345, 349 - Page 9 of 12, Columns B through W, lines 5, 9, 12, 16, 20; Column H, line 13 - Page 10 of 12, Columns X through AR, lines 5, 9, 12, 16, 20 - Page 11 of 12, Columns AS through BL, lines 5, 9, 12, 16, 20 - Page 12 of 12, Columns BM through BR, lines 5, 9, 12, 16, 20 	<p>This document contains confidential business information created by Sprint to ascertain the ability of Sprint to successfully enter the residential market in Florida. This information would be of considerable value to Sprint's competitors, and its public disclosure would seriously hamper Sprint's ability to compete in the residential market.</p>