

CERTIFICATE OF SERVICE
DOCKET NO. 030867-TL, 030868-TL, 030869-TL, & 030961-TI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. Mail this 20th day of November to the following:

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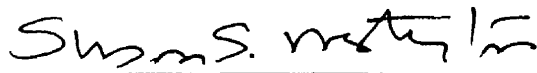
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A handwritten signature in cursive script, appearing to read "Susan S. Masterton".

Susan S. Masterton

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 20, 2003

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

On October 30, 2003, Sprint-Florida, Incorporated ("Sprint") filed its Supplemental 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 30, 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 "Edge Out" document**

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

DOCUMENT NUMBER DATE

11795 NOV 20 03

FPSC-COMMISSION CLERK

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 20th day of November, 2003.



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ATTACHMENT A

Sprint's Supplemental Response to Citizens' POD No. 6, "Edge Out" document, page and line numbers	Justification for Confidential Treatment
page 2, highlighted information: lines 2 & 3 and 8-13	Information relating to Sprint's competitive interests; the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 3, highlighted information: introductory text, lines 1; Box B, lines 3 and 5-17; Box C, lines 2-4 and 7-16; Box D lines 1 & 2 and 4-11	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 4, highlighted information: column A, lines 2-14 and 17; column B, lines 2-4 and 9-19	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 5, highlighted information: lines 1, 5, 10, 14 & 15	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 7, highlighted information: lines 1-3, 5-19, and 21-26	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 8, highlighted information: Box A, lines 2-9; Box B, lines 2-11; Box C, lines 2-14; Box D, lines 2-14	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 9, highlighted information: introductory text, line 2; column A, lines 1, 5-16, 18 and 20-27; column B, lines 6-12	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 10, highlighted information: introductory text, lines 1-3; column A, diagram and lines 2-16; column B, diagram and lines 2-7	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 11, highlighted information: lines 2-7 and 10 & 11	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 12, highlighted information: column A, lines 2-12 and lines 14-23; column B, lines 1-15 and 17-27	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 13, highlighted information: column A, lines 3-20; column B lines 3-14	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.

page 14, highlighted information: introductory text, lines 1, 3 and 4; column A, lines 1 and 3-13 and 16; column B, lines 1-12	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 15, highlighted information: Box A, lines 1-15; Box B lines 1-10 and 12-17; Box C, lines 2-14 and 16-19; Box D, lines 2-10, 12 and 13	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 16, highlighted information: Box A, column A, lines 2 & 18, columns B-F, lines 4-19; Box B, lines 1-8, 10 and 12-25	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 17, highlighted information: introductory text, lines 1 & 2; column A, lines 9-25, column K, lines 6, 10, 11, 14, 16, 18, 23, and 25	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 18, highlighted information: lines 1-7, 9 & 10, and 14-18; Box B, lines 1-5	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 19, highlighted information: lines 1-17	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 20, highlighted information: introductory text, line 1; Box A, lines 2-7; Box B, lines 2-8; Box C, lines 3-11; Box D, lines 1-7; Box E, lines 2-8; and Box F, lines 2-3	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 21, highlighted information: introductory text, line 1; Box A, lines 1-22; Box B, lines 2-19	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 22, highlighted information: introductory text, lines 1; Box A, lines 1-8; Box B, lines 1-8; Box C, lines 1-12, Box D, lines 1-6; Box E, lines 1-7; Box F, lines 1-4	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 23, highlighted information: introductory text, line 1; Box A, lines 1-6; Box B, lines 1-6; Box C, lines 1-11; Box D, lines 1-9; Box E, lines 1-7; and Box F, lines 1-4	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.
page 24, highlighted information: introductory text, line 1; Box A,	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive

lines 2-7; Box B, lines 1 and 3-13; Box C, lines 1 and 3-15; Box D, lines 1, 3-9 and 11-13	business. s. 364.183(3)(e), F.S.
page 25, highlighted information: Box A, lines 2-9; Box B, lines 2-13, Box C, lines 2-12 and Box D, lines 2-12	Information relating to Sprint's competitive interests, the disclosure of which would impair the Sprint's competitive business. s. 364.183(3)(e), F.S.