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January 2, 2004

BY HAND DELIVERY

Ms. Blanca Bayó, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket Nos. 030867-TL, 030868-TL, 030869-TL and 030961-TI

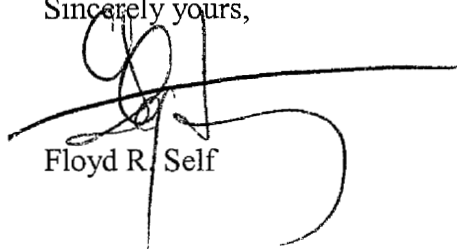
Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. are an original and fifteen copies of MCI's Request for Confidential Treatment in the above referenced dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self

FRS/amb
Enclosures

DOCUMENT NUMBER-DATE
00032 JAN-2 2004
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Flow-through of LEC Switched Access Reductions by IXCs, Pursuant to Section 364.163(2), Florida Statutes.	DOCKET NO. 030961-TI
In re: Petition by Verizon Florida Inc. to reform intrastate network access and basic local telecommunications rates in accordance with Section 364.164, Florida Statutes.	DOCKET NO. 030867-TL
In re: Petition by Sprint-Florida, Incorporated to reduce intrastate switched network access rates to interstate parity in revenue-neutral manner pursuant to Section 364.164(1), Florida Statutes.	DOCKET NO. 030868-TL
In re: Petition for implementation of Section 364.164, Florida Statutes, by rebalancing rates in a revenue-neutral manner through decreases in intrastate switched access charges with offsetting rate adjustments for basic services, by BellSouth Telecommunications, Inc.	DOCKET NO. 030869-TL FILED: January 2, 2004

REQUEST FOR CONFIDENTIAL TREATMENT

MCI WorldCom Communications, Inc. (hereinafter "MCI"), pursuant to section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, requests confidential treatment of certain data previously filed in these dockets pursuant to a claim for confidentiality. In support of this request MCI hereby states:

1. Pursuant to the procedure established by the Commission in this docket, on November 19, 2003, MCI prefiled Direct Testimony of Joseph Dunbar for presentation at the hearings which began December 10, 2003. On November 25, 2003, revised direct testimony was filed with a clarification to a portion of the testimony. The prefiled direct testimony included information considered to be and treated as proprietary and confidential, and on November 19, 2003,

and November 25, 2003, MCI filed the appropriate corresponding claim for confidentiality as to those portions pursuant to section 364.183(1), Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. During the scheduled hearings, Mr. Dunbar did appear and sponsor his revised prefiled testimony and respond to cross-examination. The revised testimony which was admitted contains the information which was subject to the November 25, 2003 claim of confidentiality.¹ Pursuant to Rule 25-22.006(8)(b), Florida Administrative Code, MCI requests that the Commission grant confidential treatment to the information contained in the direct testimony of Mr. Joe Dunbar, and specifically that information identified as confidential on lines 1 and 8 of page 1419 of the hearing transcript (page 6 of the revised prefiled direct testimony). The public and redacted copies required by Rule 25-22.006(4) are not being filed at this time as they were filed with the claim filed on November 25, 2003.

3. The information for which confidential treatment is requested reveals the amount of access savings expected by MCI (Line 8, Tr. 1419) and the allocation of the flow-through to MCI's residential and business customers (Line 1, Tr. 1419). MCI considers such information to be trade secrets and proprietary, confidential business information which, if disclosed, would be of benefit to competitors and cause harm to the Company and its customers. Such information provides MCI an economic benefit, and is not known to nor readily ascertainable to other persons. Such information is economically valuable to MCI and its competitors, and MCI treats such information as confidential and maintaining many processes and procedures to maintain its secrecy.

¹ The original prefiled testimony and claim for confidentiality filed on November 19, 2003, are not subject to this request, and do not require a request, as such testimony was not entered into the record.

4. As was recognized throughout the hearing in this case, the long distance market in Florida is highly competitive, and the level of competition among interexchange carriers (“IXCs”) is undisputed. Given the intensity of the Florida long distance market, any information or data that reveals or can be used to reveal customers, types of customers, or the percentages of residential and business customers is highly confidential. This information on line 1, page 1419, is, and is absolutely treated by MCI, as confidential, proprietary, trade secret information. Over the years, MCI has spent millions of dollars developing and implementing its marketing strategies. Such information, if publicly available, would reveal to MCI’s competitors MCI’s business plans and the success of its marketing strategy. In the long distance business, a company’s most valuable asset is its customer base, and any public disclosure of MCI’s customer base would be unfair, competitively adverse, and extremely damaging to MCI’s business position. This damage would be compounded in this situation by the fact that since there are only a few IXCs that have participated in this case, and the other IXCs would have the benefit of MCI information while keeping their own information secret.

5. Disclosure of the amount of the expected access charge reduction flow-through on line 8, page 1419, would be equally damaging to MCI’s business. The amount of savings reveals not only MCI’s usage of access services, but discloses amounts that can be used by MCI to offer reductions or new services to current and potential customers. In both instances, the information is valuable to MCI because it is used in formulating plans and strategies, and it is also valuable to competitors because it provides them with better information as to the ability of MCI to compete. Although MCI’s service offerings and products are public and advertised, the information for which confidential treatment is sought is not readily or easily ascertainable by other parties, and it is not

disclosed by MCI in a public manner. Indeed, any disclosure of the subject MCI confidential information would be especially damaging since all of the information at issue pertains to future expected company actions in anticipation of the approval of the ILEC Petitions. In this instance, public disclosure of future business plans is extremely anti-competitive because it signals how MCI is going to set future rates, months in advance. The antitrust laws recognize that information about future business conduct, especially a company's future prices for services to customers, is extremely valuable to competitors and can lead to a market where customers are subject to inappropriate conduct. While the instant situation is not an antitrust problem, the consequences of a public disclosure of MCI's future business plans can have the same type of consequences and place MCI at a huge marketing disadvantage because all the other IXCs would be able to continue to retain their information as secret.

6. A trade secret is defined in section 688.002 (4), Florida Statutes, the Uniform Trade Secrets Act, to mean:

. . . information, including a formula, pattern, compilation, program, devise, 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.

The information at issue fits plainly in this definition as set forth above. Accordingly, the Commission should grant the request for confidential treatment and find the information on lines 1 and 8, page 1419 of the hearing transcript, to be confidential and exempt from section 119.071(1), Florida Statutes, pursuant to section 364.183(3)(a).

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Floyd Self', is written over a horizontal line. The signature is stylized and somewhat cursive.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Hand Delivery and/or U. S. Mail this 2nd day of January, 2004.

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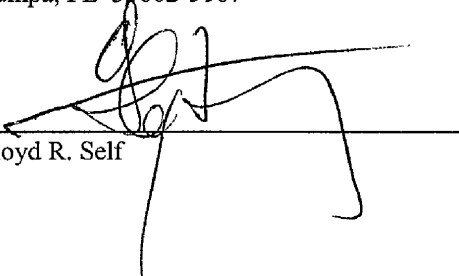
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