

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) DOCKET NO. 030851-TP  
from Federal Communications Commission's )  
Triennial UNE review: Local Circuit Switching ) FILED: February 19, 2004  
for Mass Market Customers. )  
\_\_\_\_\_ )

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

Sprint-Florida, Incorporated (hereinafter, "Sprint-Florida") 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.

1. The information that is the subject of this request is information that that is confidential and proprietary to Sprint, the release of which would impair the competitive business of Sprint. Sprint previously filed a Notice of Intent to Request Confidential Classification related to this information on January 16, 2004 and is filing this request pursuant to Rule 25-22-2006, F.A.C. The following documents or excerpts from documents are the subject of this request:

**Highlighted information in the attachment to Sprint's Supplemental Response to Interrogatory No. 43**

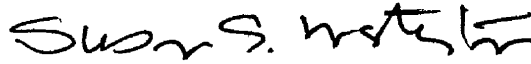
**Highlighted information in Sprint's Supplemental Response to Interrogatory No. 44**

**Highlighted information in the attachment to Sprint's Supplemental Response to Interrogatory No. 51**

2. Two redacted copies of the information are attached to this request. One unredacted copy of the confidential information was filed under seal with the Division of Records and Reporting on January 16, 2004.
3. The information for which the Request is submitted is information the release of which would impair Sprint's competitive business interests and is confidential and proprietary to Sprint. 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 and Sprint.

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 19<sup>th</sup> day of February 2004.



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ATTORNEY FOR SPRINT

## ATTACHMENT A

| Document and page and line numbers   | Justification for Confidential Treatment   |
|--|--|
| Highlighted Information in the Attachment to Sprint's Response to Staff's Interrogatory No. 43, column 4, lines 4-17 | This information is proprietary, competitively sensitive information relating to Sprint's workforce. The information is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business of Sprint. Section 364.183(3)(e), F.S. |
| Highlighted information in Sprint's Response to Staff's Interrogatory No. 44.  | This information is proprietary, competitively sensitive information relating to Sprint's workforce. The information is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business of Sprint. Section 364.183(3)(e), F.S. |
| Highlighted Information in the Attachment to Staff's Interrogatory No. 51, 2, lines 3-5                              | This information is proprietary, competitively sensitive information relating to Sprint's workforce. The information is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business of Sprint. Section 364.183(3)(e), F.S. |