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March 19, 2004

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**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 No. 030851-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. are an original and fifteen copies of MCI WorldCom Communications, Inc.'s Request for Confidential Classification for portions of the supplemental rebuttal testimony of Sherry Lichtenberg filed in the above referenced docket.

*Lichtenberg (uf)*

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,

*Monica M. Evans*  
*for* Floyd R. Self

This confidentiality request was filed by or for a "telco" for DN 01079-04. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising )  
from Federal Communications Commission ) Docket No. 030851-TP  
triennial UNE review: Local Circuit Switching )  
for Mass Market Customers ) Filed: March 19, 2004  
\_\_\_\_\_ )

**MCI'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

MCImetro, Access Transmission Services, LLC and MCI WorldCom Communications, Inc. (hereinafter "MCI"), pursuant to section 364.183, Florida Statutes, and Rule 25-2.006, Florida Administrative Code, requests confidential classification of certain data previously filed in this docket pursuant to a claim for confidentiality. In support of this request MCI hereby states:

1. On January 22, 2004, MCI filed in the above-captioned proceeding the transcript of the Supplemental Rebuttal Testimony of Sherry Lichtenbergt. Lichtenberg's testimony included confidential and proprietary information. When MCI filed the transcript of Lichtenberg's supplemental rebuttal testimony, it filed the appropriate corresponding Claim for Confidential Treatment, in accordance with Rule 25-22.006(5) and section 364.183(1), Florida Statutes.

2. MCI hereby files this Request for Confidential Classification, in accordance with Rule 25-22.006(4), Florida Administrative Code, for the confidential and proprietary aspects of Lichtenberg's supplemental rebuttal 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 January 22, 2004.

3. The information for which confidential classification is requested reveals confidential and proprietary business information. Specifically, the information includes:

(a) Page 3, line 23 and Page 4, lines 1 and 3 of Lichtenberg's Supplemental Rebuttal Testimony: Lichtenberg rebuts Ms. Tipton's assertions on how many switches MCI has in a particular ILEC service territory;

(b) Page 5, lines 1, 2, 3 and 4 of Lichtenberg's Supplemental Rebuttal Testimony: Lichtenberg provides specific information on how many wire centers in Florida MCI is collocated in, and in how many of those wire centers MCI has UNE-L lines;

(c) Confidential Exhibits to Lichtenberg's Supplemental Rebuttal Testimony: SL-6 (MCI Switch Information); SL-7 (MCI Line Count).

5. The information contained in Lichtenberg's supplemental rebuttal testimony referenced above, and the corresponding confidential exhibits, provide specific information on MCI's assessment of the Florida market, as well as the number of switches, collocations and UNE-L lines it is providing in Florida. 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 MCI and its customers. Such information provides MCI an economic benefit, and is not known or readily ascertainable to other persons. Such information is economically valuable to MCI and its competitors, and MCI treats such information as confidential and maintains many processes and procedures to maintain its secrecy.

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

[I]nformation, 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 be

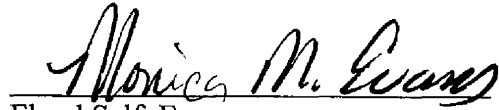
readily ascertainable by proper means by, other persons  
who can obtain economic value from its disclosure or use;  
and

(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 classification and find confidential and proprietary aspects of Lichtenberg's supplemental rebuttal testimony to be confidential and exempt from section 119.071(1), pursuant to section 364.183(3)(a).

WHEREFORE, based on the foregoing, MCI respectfully requests that, pursuant to Section 364.183, Florida Statutes, the Commission enter an Order declaring the information described above to be confidential, proprietary business information that is not subject to public disclosure.

Respectfully submitted,

  
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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 on this 19<sup>th</sup> day of March, 2004.

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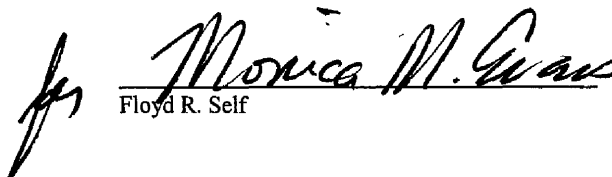
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