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## 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: March 19, 2004
for Mass Market Customers.	)	
	)	

## Sprint Communications Company Limited Partnership's and Sprint-Florida, Incorporated's Request for Confidential Classification Pursuant to Section 364.183(1), Florida Statutes

Sprint Communications Company Limited Partnership and Sprint-Florida, Incorporated (hereinafter, "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 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 February 20, 2004 and February 23, 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 on pages 8-13 of Sprint's Supplemental Testimony and Exhibits of Kent W. Dickerson and Christy V. Londerholm (Document No. 02531-04)

Highlighted information in Exhibit KWD-13 (Document No. 02531-04)

Highlighted information in Corrected page 9 of the Supplemental Testimony and Exhibits of Kent W. Dickerson and Christy V. Londerholm (Document No. 02680-04)

This confidentiality request was filed by or for a "telco" for DN 03068-04. 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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- 2. Two redacted copies of the information are attached to this request. One unredacted copy of the information is being filed under separate cover on this same date.
- 3. The information for which the Request is submitted contains information that is proprietary to Sprint or information that is the subject of a prior request for confidential classification by another party to this proceeding. Detailed justification for the request for confidential classification 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 19th day of March 2004.

Susan S. Masterton

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Tallahassee, Florida 32316-2214

850/599-1560

ATTORNEY FOR SPRINT

## ATTACHMENT A

Document and	Justification for Confidential Treatment
page and line	
numbers	·
Highlighted	Contains information from BellSouth's BACE Model for which
information on	BellSouth requested confidential classification which was granted by
page 8, lines	the Commission in Order No. PSC-04-0193-CFO-TP and information
14, 15 & 16;	relating to Sprint's competitive interests the disclosure of which would
page 9, lines 2,	impair the competitive business of Sprint. S. 364.183(3)(e), F.S.
3, 4, 16, 18,	
and 19; page	
10, line 5; page	
11, lines 5, 9,	
10, 11, 12, 14,	
15, 16, 18, and	
19; page 12,	
lines 3 and 19;	
and page 13,	
lines 5, 6, 7, 8,	
9, 12, and 13 of	
the	
Supplemental	
Testimony of	
Kent W.	
Dickerson and	
Terry L.	
Alleman	
(Document No.	
02531-04)	
Highlighted	Contains information from BellSouth's BACE Model for which
information on	BellSouth requested confidential classification which was granted by
page 1, lines 5-	the Commission in Order No. PSC-04-0193-CFO-TP and information
35, page 2,	relating to Sprint's competitive interests the disclosure of which would
lines 10-32 and	impair the competitive business of Sprint. S. 364.183(3)(e), F.S.
page 3, lines	
45-69 of	
Exhibit KWD-	
13 (Document	
No. 02531-04)	

Highlighted	Contains information from BellSouth's BACE Model for which
information on	BellSouth requested confidential classification which was granted by
corrected page	the Commission in Order No. PSC-04-0193-CFO-TP and information
9, lines 3, 16,	relating to Sprint's competitive interests the disclosure of which would
18, and 19 of	impair the competitive business of Sprint. S. 364.183(3)(e), F.S.
the	
Supplemental	-
Testimony of	
Kent W.	
Dickerson and	
Christy V.	
Londerholm	
(Document No.	
02680-04)	