

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 request 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 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 11, 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 Sprint's Responses to BellSouth's Interrogatories Nos. 12, 13, 14, 20, 21, 29, and 30 (Document No. ~~0195-04~~ 01995-04 ¹¹⁷)

Highlighted information in the attachments to Sprint's Response to BellSouth's Interrogatories Nos. 2, 4, 5, 9, 21, 22, 56b (CD only), 56c (CD only), 59, 60a (CD only), and 60b (Document Nos. 01995-04 & 02048-04)

Highlighted information in Sprint's Response to BellSouth's POD No. 14 and the attachment to POD No. 3 (CD only) and 12 (Document No. 01995-04 & 02048-04)

This confidentiality request was filed by or for a "telco" for DN _____. 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.

(01995-04 + 02048-04)

DOCUMENT NUMBER-DATE

03766 MAR 19 3

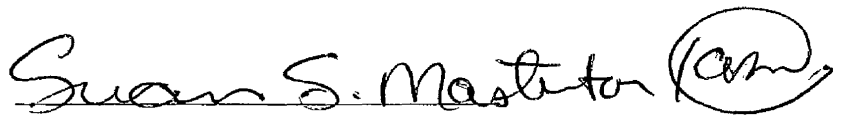
FPSC-COMMISSION CLERK

2. Two redacted copies of the information are attached to this request. One unredacted copy of the information was filed under separate cover on:

Document No. 01995-04 and 02048-04 on February 11, 2004
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. 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.

Handwritten signature of Susan S. Masterton in cursive, with the initials "CSM" circled at the end.

Susan S. Masterton
Post Office Box 2214
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850/599-1560

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Highlighted information in Sprint's Response to BST Interrogatory No. 12 (Document No. 01995-04)	Contains information relating to Sprint CLEC's customers which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 13 (Document No. 01995-04)	Contains information relating to Sprint CLEC's customers which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 14 (Document No. 01995-04)	Contains information relating to Sprint CLEC's customers which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 20 (Document No. 01995-04)	Contains information relating to Sprint CLEC's customers which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 21 (Document No. 01995-04)	Contains information relating to Sprint CLEC's customer acquisition costs which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 29 (Document No. 01995-04)	Contains information related to Sprint CLEC's cost of capital, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 30 (Document No. 01995-04)	Contains information related to Sprint CLEC's cost of capital, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.

Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 2 (Document No. 01995-04 & 02048-04)	Contains information related to Sprint CLEC's UNE-P local service offering, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 4 (Document No. 01995-04 & 02048-04)	Contains information related to Sprint CLEC's UNE-P local service offering, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's Interrogatory No. 5 (Document No. 01995-04 & 02048-04)	Contains information related to Sprint CLEC's UNE-P local service offering, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Sprint's Response to BellSouth's Interrogatory No. 9 (entire document) (Document No. 01995-04)	Contains information related to Sprint's business cases for its competitive local service offerings, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in the attachment of Sprint's Response to BellSouth's Interrogatory No. 21 (Document No. 01995-04 & 02048-04)	Contains information related to Sprint's customer acquisition costs for its facilities-based competitive local service offerings, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in the attachment of Sprint's Response to BellSouth's Interrogatory No. 22 (Document No. 01995-04 & 02048-04)	Contains information related to churn for Sprint's facilities-based competitive local service offerings, which is information relating to Sprint's competitive interest, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in the attachment of Sprint's	Contains information from BellSouth's BACE Model for which BellSouth requested Confidential

Response to BellSouth's Interrogatory No. 56b (CD only, entire CD) (Document No. 01995-04 & 02048-04)	Classification which has been granted by the Commission in Order No. PSC-04-0193-CFO-TP
Highlighted information in the attachment of Sprint's Response to BellSouth's Interrogatory No. 56c (CD only, entire CD) (Document No. 01995-04 & 02048-04)	Contains information from BellSouth's BACE Model for which BellSouth requested Confidential Classification which has been granted by the Commission in Order No. PSC-04-0193-CFO-TP
Highlighted information in the attachment of Sprint's Response to BellSouth's Interrogatory No. 59 (entire document) (Document No. 01995-04 & 02048-04)	Contains information from BellSouth's BACE Model for which BellSouth requested Confidential Classification which has been granted by the Commission in Order No. PSC-04-0193-CFO-TP
Highlighted information in Sprint's Response to BellSouth's POD No. 14 (Document No. 01995-04)	Contains information related to Sprint's bad debt expenses, which is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.
Highlighted information in Sprint's Response to BellSouth's POD No. 3 (CD only, entire CD) (Document No. 01995-04 & 02048-04)	Contains information from BellSouth's BACE Model for which BellSouth requested Confidential Classification which has been granted by the Commission in Order No. PSC-04-0193-CFO-TP
Information in the attachment to Sprint's Response to BellSouth's POD No. 12 (entire document) (Document No. 01995-04)	Contains information relating to Sprint's sales expense which is information relating to Sprint's competitive interests, the disclosure of which would impair the competitive business interests of Sprint. s.364.183(3)(e), F.S.