

ORIGINAL



Susan S. Masterton  
Attorney

Law/External Affairs  
FLTLH00103  
1313 Blair Stone Rd.  
Tallahassee, FL 32301  
Voice 850 599 1560  
Fax 850 878 0777  
susan.masterton@mail.sprint.com

April 15, 2004

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
& Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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Re: Docket No. 981834-TP and 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated are an original and 15 copies of Sprint's Request for Confidential Classification.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to my assistant. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

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**CERTIFICATE OF SERVICE  
DOCKET NO. 981834-TP & 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. and electronic mail on April 15, 2004 to the following:

Adam Teitzman, Esq.  
Jason Rojas, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Nancy B. White (+)  
c/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

Phillip Carver  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street, Suite 400  
Tallahassee, Florida 32301-1556

Florida Cable Telecommunications  
Association, Incorporated  
Michael A. Gross  
246 E. 6th Avenue, Suite 100  
Tallahassee, FL 32303

McWhirter Law Firm  
Vicki Kaufman/Joseph McGlothlin  
117 S. Gadsden Street  
Tallahassee, Florida 32301

Messer Law Firm  
Floyd Self/Norman Horton  
Post Office Box 1876  
Tallahassee, Florida 32302

AT&T Communications of the  
Southern States, Inc.  
Tracy W. Hatch (+)  
101 North Monroe Street, Suite 700  
Tallahassee, Florida 32301-1549

AT&T Communications of the Southern  
States, Inc. (GA)  
Virginia C. Tate  
1200 Peachtree St., N.E., Suite 8100  
Atlanta, GA 30309

Supra Telecommunications &  
Information Systems, Inc.  
Mark E. Buechele  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133

Verizon-Florida, Incorporated  
Richard Chapkis (+)  
201 N. Franklin St., FLTC0007 (33602)  
P.O. Box 110, FLTC0007  
Tampa, FL 33601


Florida Digital Network, Inc.  
Matthew Feil, Esq. (+)  
390 North Orange Ave., Suite 2000  
Orlando, FL 32801

Covad Communications Company  
Mr. Charles E. Watkins  
1230 Peachtree Street, NE, 19<sup>th</sup> Floor  
Atlanta, GA 30309-3574

Shook, Hardy & Bacon, LLP  
Rodney L. Joyce  
600 14<sup>th</sup> Street, N.W., Suite 800  
Washington, DC 20005-2004

Wilmer Law Firm  
C. Ronis/D. McCuaig/J. Frankel  
2445 M Street, N.W  
Washington, DC 20037-1420

Beth Keating, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

  
Susan S. Masterton

(+ Signed Protective Agreement)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for  
Commission action to support local  
competition in BellSouth  
Telecommunications, Inc.'s service territory.

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DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated  
Connections, Inc. for generic investigation to  
ensure that BellSouth Telecommunications,  
Inc., Sprint-Florida, Incorporated, and GTE  
Florida Incorporated comply with obligation to  
provide alternative local exchange carriers  
with flexible, timely, and cost-efficient  
physical collocation.

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DOCKET NO. 990321-TP

Filed: April 15, 2004

**Sprint'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 proprietary vendor-specific pricing information the disclosure of which would impair the efforts of Sprint or its affiliates to contract for goods or services on favorable terms. Sprint previously filed a Claim of Confidentiality related to this information on March 14, 2003. Subsequently, this information was included as a confidential exhibit at the hearing held in this docket on January 28 and 29, 2004. Pursuant to Rule 25-22.006, F.A.C., Sprint must file a request for confidential classification in order for the information to maintain its

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confidential status.<sup>1</sup> The following documents or excerpts from documents are the subject of this request:

**Sprint's Responses to AT&T's First Request for Production of Documents Nos. 9, 14 & 22.**

2. Two redacted copies of the information are attached to this request. One unredacted copy of the confidential information was filed with the Commission on March 14, 2003.

3. 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.

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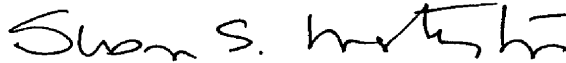
<sup>1</sup> Rule 25-22.006, F.A.C., provides that a request for confidential classification be filed within 21 days after the hearing for any information subject to a claim of confidentiality that is admitted into the hearing record. Counsel for Sprint believed that all of the information for which Sprint had previously filed a notice of intent or claim for confidentiality was addressed in the several requests for confidentiality Sprint has previously filed in this docket. Upon realizing that this document was inadvertently omitted from these previous requests and subsequent Commission orders granting the requests, Sprint is filing this request so that the information may continue to be held confidential by the Commission.

4. The information for which the Request is submitted is information the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms. Specific justification for confidential treatment is set forth in Attachment A.

5. The subject information has not been publicly released by 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 15th day of April 2004.



Susan S. Masterton  
Susan S. Masterton  
Post Office Box 2214  
Tallahassee, Florida 32316-2214  
850/599-1560

ATTORNEY FOR SPRINT

## ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Sprint's Response to AT&T's POD No. 9 – entire document	This information is RS Means data. RS Means is a proprietary data base, which Sprint is required to keep confidential pursuant to the terms of Sprint's use of such information. Disclosure of the information would impair the efforts of Sprint or its affiliates to contract for goods or services on favorable terms. s. 364.183(3)(d), F.S.
Sprint's Response to AT&T's POD No. 14 – entire document	This information is vendor-specific pricing information containing a price quote for power plant equipment, engineering and installation, the disclosure of which would impair the efforts of Sprint or its affiliates to contract for goods or services on favorable terms. s. 364.183 (3)(d), F.S.
Sprint's Response to AT&T's POD No. 22 – entire document.	This information is vendor-specific pricing information containing vendor prices for collocation equipment the disclosure of which would impair the efforts of Sprint or its affiliates to contract for goods or services on favorable terms. s. 364.183(3)(d), F.S.

Sprint-Florida, Incorporated  
Docket Nos. 981834-TP & 990321-TP  
AT&T Request for Production of Documents (1-22)  
March 14, 2003  
Request for Production of Documents No. 9

**REQUEST:** Please provide copies of all actual worksheets from the RS Means guide used to provide inputs into the Sprint collocation cost study. Please accompany these worksheets with an explanation of how the values from RS Means were used in the cost study.

**RESPONSE:** The four RS Means worksheets used in the cost study are attached (labeled POD-9A thru POD-9D). The values shown were used to support the cost study as follows:

POD-9A develops the median cost per square foot for floor space. RS Means provides the cost by zip code. The median costs are then applied by location to each Sprint office and a weighted cost per square foot is developed in the study with Workpaper 4.1 (Column F – BB2).

POD-9B includes the RS Means cost for Core Drilling a 4" diameter hole into the building's concrete slab. This cost is detailed in Workpaper 15 for the Internal Cable Space Riser.

POD-9C develops Architect & Engineering Fees. Handwritten on this page is a calculation showing the addition of the Architect & Engineering Fee and the Construction Management Fee from POD-9D. The total of the two fees is shown on Line 30 on the Input Sheet. This cost is, in turn, used to develop the Architect, Engineering and Construction Management Fee cost included on Line 2 of the Floor Space Investment (Workpaper 4).

POD-9D is used to develop the Construction Management Fee, which is included in POD-9C in development of the Architect, Engineering and Construction Management Fee.



**Sprint-Florida, Incorporated**  
**Docket Nos. 981834-TP & 990321-TP**  
**AT&T Request for Production of Documents (1-22)**  
**March 14, 2003**  
**Request for Production of Documents No. 9**

**PODs-9A Through D are excluded as they are proprietary.**

Sprint Florida, Incorporated  
Docket Nos. 981834-TP & 990321-TP  
AT&T Request for Production of Documents (1-22)  
March 14, 2003  
Request for Production of Documents No. 14

**REQUEST:** Please provide all contractor quotes for the inputs included in Sprint's DC Power investments.

**RESPONSE:** POD-14A shows DC Power equipment cost items in a contractor quote from PECO II, Inc. POD-14B shows power distribution service cabinet contractor quotes, provided by Fakouri Electrical, that appear on workpaper 5.1 of the collo study.

Sprint Florida, Incorporated  
Docket Nos. 981834-TP & 990321-TP  
AT&T Request for Production of Documents (1-22)  
March 14, 2003  
Request for Production of Documents No. 14

**PODs-14A and 14B are excluded as they are proprietary.**

**Sprint-Florida, Incorporated**  
**Docket Nos. 981834-TP & 990321-TP**  
**AT&T Request for Production of Documents (1-22)**  
**March 14, 2003**  
**Request for Production of Documents No. 22**

**REQUEST:** Numerous elements have as their Source a document entitled as the "Equipment Price List." These prices are summarized in the Equipment Prices Worksheet of the JRD-2 Florida Collo Study - Feb 4 - Proprietary Workbook. Please provide all backup documentation, invoices, contracts, or other supporting documentation for the prices contained in the "Equipment Price List."

**RESPONSE:** The pricing support for equipment items is attached. Prices for the items which are shaded in the center group of Equipment Prices may be found in the response to Production of Documents # 14 from PECO II, Inc.

In addition to the cost of the material, Sprint's supplier adds a material handling fee (12.84%), which is applied to all work orders. This fee was added to all items in our cost study except for the PECO II (vendor quote) power items (shaded on the equipment list) and the 1-Fiber SC-SC Jumper (40 Meter) vendor quote. Also, the material handling fee was not separately applied to the C377 TIN Bonded Cable (from a Work Activity Study) because the material handling fee had already been applied in the workorders. The material handling fee is assessed to Sprint-Florida, Inc. on a monthly basis and is included in workorder charges for collocation projects. The fee rate of 12.84% is based on the vendor handling fee divided by purchased materials amounts (before the fee) for the twelve months ended October 2002.

In the course of preparing this response to POD-22, it was discovered that hardcopy backups of the cost for three items were not retained. We have, however, provided current costs (3/5/03) for those items, which are in line with the costing used in our study.

**Sprint-Florida, Incorporated**  
**Docket Nos. 981834-TP & 990321-TP**  
**AT&T Request for Production of Documents (1-22)**  
**March 14, 2003**  
**Request for Production of Documents No. 22**

**Pricing support documentation has been excluded as it is proprietary.**