

ORIGINAL



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May 19, 2004

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

COMM
MAY 19 AM 10:26
COMMISSION
CLERK
D-FPSC

RE: Docket No. 001503-TP

Dear Ms. Bayo:

Enclosed with this letter are the original and 15 copies of:

1. Sprint's Renewed Request for Confidential Classification and
2. Exhibit 18 (Revenue Impact of Sprint price changes) to Joint Stipulation of the Record of BellSouth Telecommunications, Inc., Sprint-Florida, Inc. and Citizens of Florida

Copies are being served on the parties to 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 the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL T
- OPC _____
- MMS _____
- RCA _____
- SCR _____
- SEC I
- OTH Leone records

Sincerely,

Susan S. Masterton

Enclosure

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

Att. 18
DOCUMENT NUMBER-DATE
05729 MAY 19 03
FPSC-COMMISSION CLERK

Request
DOCUMENT NUMBER-DATE
05714 MAY 19 03
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 001503-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. mail on this 19th day of May, 2003 to the following:

ALLTEL Communications, Inc.
c/o Ausley Law Firm
Jeffrey Wahlen
P.O. Box 391
Tallahassee, FL 32302

AT&T Communications of the Southern
States, Inc.
101 N. Monroe St., #700
Tallahassee, FL 32301

BellSouth Telecommunications, Inc.
Nancy White/M. Goggin/R. D. Lackey
c/o Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

MCI
Ms. Donna C. McNulty
1203 Governors Square Blvd., Suite 201
Tallahassee, FL 32301-2960

Messer Law Firm
Floyd Self
P.O. Box 1876
Tallahassee, FL 32302

Office of Public Counsel
Charles Beck
c/o The Florida Legislature
111 W. Madison St., #812
Tallahassee, FL 32399-1400

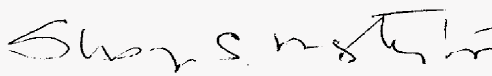
Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32302-2095

Time Warner Telecom of Florida, L.P.
Ms. Carolyn Marek
233 Bramerton Court
Franklin, TN 37069-4002

Verizon Florida Inc.
Kimberly Caswell
P.O. Box 110, FLTC0007
Tampa, FL 33601-0110

Verizon Wireless
Anne Hoskins, Esq.
1300 I Street, NW
Suite 400 West
Washington, DC 20005

Florida Public Service Commission
Patricia (Patty) Christensen
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850


Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: cost recovery and) Docket No. 001503-TP
allocation issues for number)
pooling trials in Florida.) Filed: May 19, 2004
_____)

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

Sprint-Florida, Incorporated ("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. The information that is the subject of this request is contained in certain documents contained in Sprint's cost studies filed in this docket. The information was previously granted confidential status by the Commission in Order No. PSC-02-1416-CFO-TP, however, that Order has expired.

1. The following documents or excerpts from documents are the subject of this request:

**Highlighted portions of pages 3, 4, 9 & 12 of Attachment to Exhibit A
to Sprint's Petition for Cost Recovery**

2. Unredacted copies of the documents were previously submitted to the Division of Records and Reporting under seal on September 30, 2002. The confidential information is identified by yellow highlighting. Two redacted copies of the information are attached to this request.

DOCUMENT NUMBER-DATE

05714 MAY 19 3

FPSC-COMMISSION CLERK

3. The information for which the Request is submitted is vendor-specific pricing information (or information from which such information can be derived), trade secret or other highly proprietary contractual, competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(a)(d) & (e), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment A.

4. Section 364.183(3), 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. Furthermore, Section 688.002(4), Florida Statutes is instructive on what constitutes a trade secret and provides that:

(4) "Trade secret" means information, 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 being 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.

6. The subject information has not been publicly released and Sprint is required by contract to keep certain of the information confidential. Furthermore, release of the information could impair the efforts of the company or its affiliates to contract for goods or services on favorable terms, thus causing harm to the company's business operations, and could impair the competitive business of the company.

7. The commission has previously found this information to be confidential. See, *In re: Cost Recovery and allocation issues for number pooling trials in Florida*, Docket No. 001503-TP, Order No. PSC-02-1416-CFO-TP, issued October 15, 2002.

Based on the foregoing, Sprint respectfully requests that the Commission grant Sprint's 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 May 2004.



Susan S. Masterton

Post Office Box 2214

MS: FLTLHO0107

Tallahassee, Florida 32316

850/599-1560

ATTORNEY FOR SPRINT

ATTACHMENT A

Portions of Attachment to Exhibit A to Petition for Cost Recovery Treated as proprietary	Justification for Confidential Treatment
p.3, Column D, lines 3-15 & lines 20-32 and Column I, lines 3-15 & 20-32	Document contains investment amounts related to Sprint's switch upgrades which is third party proprietary data relating to Sprint's switching costs. Allowing competitors access to this information would impair Sprint's competitive business interests.
p. 4, Column E, lines 3-15 & lines 20-32 and Column J, lines 3-15 & lines 20-32	Document contains investment amounts related to Sprint's switch upgrades which is third party proprietary data relating to Sprint's switching costs. Allowing competitors access to this information would impair Sprint's competitive business interests.
p. 9, Column F, lines 2-15	Document contains investment amounts related to Sprint's switch upgrades which is third party proprietary data relating to Sprint's switching costs. Allowing competitors access to this information would impair Sprint's competitive business interests.
p. 12, Columns H-O, Rows 1, 3, 5, and 7, Column	Document contains data regarding investments related to OSS enhancements. This information is proprietary because it would allow competitors to "back into" information relating to Sprint's switch upgrades, which is third party proprietary data relating to Sprint's switching costs. Allowing competitors access to this information would impair Sprint's competitive business interests.

Sprint-Florida, Inc.
Number Pooling
Chart 1B
Investment, Installation Costs, and Incremental Expenses
(000) Omitted

A Ln#	B Description	C Acct	D Year 1	E Year 2	F Year 3	G Year 4	H Year 5	I Total
1								
2	Investments							
3	LTD - NPAC							
4	SS7 - STPs							
5	SS7 - SCPs	#1						
6	SS7 - Link	#1						
7	Switch NP Upgrades	2212						
8	National Pooling Admin.							
9	Cost Savings							
10	Customer Notification							
11	NPAP - Local SMS							
12	NPAP - SOA							
13	LTD - Number Administration							
14	LTD - Operations Support Systems	2124						
15	LTD - Testing, Training & Provisioning							
16	Total Material Investment		243					243
17								
18								
19	Installation Costs							
20	LTD - NPAC							
21	SS7 - STPs							
22	SS7 - SCPs	#1						
23	SS7 - Link	#1						
24	Switch NP Upgrades	2212						
25	National Pooling Admin.							
26	Cost Savings							
27	Customer Notification							
28	NPAP - Local SMS							
29	NPAP - SOA							
30	LTD - Number Administration							
31	LTD - Operations Support Systems							
32	LTD - Testing, Training & Provisioning							
33	Total Installation Investment		33					33
34								
35								
36	Expenses							
37	LTD - NPAC	6532	20					20
38	SS7 - STPs	6532	-					-
39	SS7 - SCPs	6532	-					-
40	SS7 - Link							
41	Switch NP Upgrades	6212	67					67
42	National Pooling Admin.							
43	Cost Savings		(187)					(187)
44	Customer Notification							
45	NPAP - Local SMS	6532	-					-
46	NPAP - SOA	6532	-					-
47	LTD - Number Administration	6532	262					262
48	LTD - Operations Support Systems	6724	60					60
49	LTD - Testing, Training & Provisioning		80					80
50	Total Expense		302					302

Please Note: #1 These investments are held by Sprint United Management Company. If they were held by a regulated entity they would be booked to a 2212 account.

Year 1 includes prior year investment and expenses.

51
52
53
54
55
56
57
58

Sprint-Florida, Inc.
Number Pooling
Apportionment Between Services
Exhibit 3
(000) Omitted

A	B	C	D	E	F	G
Ln #	Cost Element	Function	Required Modification	Part 32 Account	Dollar	Excl. From LTD Recov.
1	Investments					
2	LTD - NPAC	N/A				
3	SS7 - STPs	N/A	N/A	#1		0.00%
4	SS7 - SCPs	N/A	N/A	#1		0.00%
5	SS7 - Link	N/A	N/A	#1		0.00%
6	Switch NP Upgrades	Right-to-use fees for NP software and hardware for memory expansions and SP hardware additions.	N/A	#1		0.00%
7	National Pooling Admin.	N/A	Addition of NP functionality	2212		0.00%
8	Cost Savings	N/A	N/A			0.00%
9	Customer Notification	N/A	N/A	2212		0.00%
10	NPAP - Local SMS	N/A	N/A	2212		0.00%
11	NPAP - SOA	N/A	N/A	#1		0.00%
12	LTD - Number Administration	N/A	N/A	#1		0.00%
13	LTD - Operations Support System	Upgrades to Operations Support Systems for Number Pooling (NP)	N/A	2212		0.00%
14	LTD - Testing, Training & Provision	N/A	Addition of NP functionality			0.00%
15	Total Investment		N/A			0.00%
16					277	
17						
18	Expenses					
19	LTD - NPAC	Allocation portion of Sprint's NPAC charges.				
20	SS7 - STPs	N/A	Allocated expenses from NeuStar	6532	20	1.35%
21	SS7 - SCPs	N/A	N/A	6532	-	0.00%
22	SS7 - Link	N/A	N/A	6532	-	0.00%
23	Switch NP Upgrades	Right-to-use fees for NP software and hardware for memory expansions and SP hardware additions.	N/A	6532	-	0.00%
24	National Pooling Admin.	N/A	Addition of NP functionality	6212	67	1.35%
25	Cost Savings	Cost savings associated with NPA splits.	N/A		-	0.00%
26	Customer Notification	N/A	Expense Reduction	6212	(187)	0.00%
27	NPAP - Local SMS	N/A	N/A	6212	-	0.00%
28	NPAP - SOA	N/A	N/A	6532	-	0.00%
29	LTD - Number Administration	Identify donate and receive numbers from the Pooling Administrator.	N/A	6532	-	0.00%
30	LTD - Operations Support System	Identify donate and receive numbers from the Pooling Administrator and provision for call routing.	Addition of NP functionality	6212	262	0.00%
31	LTD - Testing, Training & Provision	Sprint's expenses to test, train and provision NP. (Identify, donate, receive and provision)	Addition of NP functionality	6724	80	0.00%
32	Total Expense		NP Implementation expense.		80	0.00%
33					302	
34						
35						
36						
37						
38						
39						
40						

Please Note: \$1 These investments are held by Sprint United Management Company. If they were held by a regulated entity they would be booked to a 2212 account.

Sprint-Florida, Inc.
 Number Pooling
 OSS Enhancements
 Exhibit 5

Row	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	OSS System	FCC 01-382 P	System Function	Modifications Required	Reason for	Cap/Ex	Total Cost	1998 Cost	1999 Cost	2000 Cost	2001 Cost	2002 Cost	2003	2004	
1	Telephone Number Assignment System (CODARS)	Identify, Donate Receive	Dial office administration functions and telephone number inventory	Creation of the NRUF reports for number utilization and forecast	Creation of the NRUF reports	Capital									
2	CODARS (continued)	Identify, Donate Receive, Create & Populate Database, Procedures for Querying, Routing Calls	Dial office administration functions and telephone number inventory	Client support for system planning, development, testing, and implementation for number pooling	Provisioning process to support number pooling enhancements	Expense	\$17,272	\$0	\$0	\$17,272	\$0	\$0	\$0	\$0	
3	Total Included														
4															
5	Total Capital														
6	Total Expense														
7	Total Included														
8							\$17,272	\$0	\$0	\$17,272	\$0	\$0	\$0	\$0	