

ORIGINAL SCANNED

Timolyn Henry

From: Whitt, Chrystal [CC] [Chrystal.Whitt@mail.sprint.com]
Sent: Monday, August 01, 2005 4:29 PM
To: Filings@psc.state.fl.us
Subject: 041144-TP RCC
Attachments: RCC's 1 and 2.pdf

Filed on behalf of:

Susan S. Masterton

Attorney

Law/External Affairs

Sprint

1313 Blirstone Rd.

Tallahassee, FL 32301

M/S FLTLHO0103

Voice (850)-599-1560

Fax (850)-878-0777

susan.masterton@mail.sprint.com

Docket No. 041144-TP

Title of filing: Sprint's RCC for document # 01781-05 and Sprint's RCC for document no. 02678-05

Filed on behalf of: Sprint

No. of pages: 49

Description: Sprint's RCC for document # 01781-05 and Sprint's RCC for document no. 02678-05

CMP 1
COM _____

CTR _____

ECR _____

GCL 1

OPC _____

RCA _____

SCR _____

SGA _____

SEC 1

OTH 1 copy records

8/1/2005

DOCUMENT NUMBER-DATE

07410 AUG-1 05

FPSC-COMMISSION CLERK

ORIGINAL



Susan S. Masterton
Attorney

Law/External Affairs
FLT1.H00107
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

August 1, 2005

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

Re: Docket No. 041144-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint-Florida, Incorporated is Sprint's:

1. Request for Confidential Classification for Document Nos. 01781-05
2. Request for Confidential Classification for Document No. 02678-05,

Confidential highlighted portions of Attachment to Interrogatory No. 13 - KMC Call Diagram, Attachment to POD No. 6 - KMC Correlated call Records (CCR), and Attachment to POD No. 7 - IXC Analysis are being filed under separate cover with this request.

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

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

Susan S. Masterton

Enclosure

DOCUMENT NUMBER-DATE

07410 AUG-1 2

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 041144-TP**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic and U.S. mail this 1st day of August, 2005 to the following:

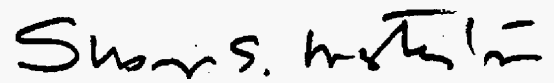
Division of Legal Services
Lee Fordham/ Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy Pruitt/Ann Marsh
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

KMC Data LLC/KMC Telecom III LLC/KMC Telecom V, Inc.
Marva B. Johnson/Mike Duke
1755 North Brown Road
Lawrenceville, GA 30043-8119

Kelley Drye & Warren LLP
Chip Yorkgitis / Barbara Miller
1200 19th Street, N.W.,
Fifth Floor
Washington, DC 20036

Floyd Self, Esq.
Messer, Caparello & Self, P.A.
215 S. Monroe Street, Ste. 701
Tallahassee, FL 32302


Susan S. Masterton

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated) Docket No. 041144-TP
Against KMC Telecom III LLC,)
KMC Telecom V, Inc. and KMC Data LLC,)
for failure to pay intrastate)
Access charges pursuant to its interconnection) Filed: August 1, 2005
Agreement and Sprint's tariffs and for violation of)
Section 364.16(3)(a), Florida Statutes.)
_____)

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

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 confidential and proprietary as set forth in Attachment A. Sprint previously filed a Claim of Confidentiality related to this information and is filing this request pursuant to Rule 25-22.006, F.A.C. The following documents or excerpts from documents are the subject of this request:

1. **Highlighted portions Interrogatory Nos. 4, 7, 8, 13, and 16**
2. **Attachment to Interrogatory No. 1 - KMC Complaint Summary**
3. **Highlighted portions of Attachment to Interrogatory No. 13 - KMC Call Diagram**
4. **Highlighted portions of Attachment to POD No. 6 - KMC Correlated call Records (CCR)**
5. **Highlighted portions of Attachment to POD No. 7 - IXC Analysis**
6. **Attachment to POD No. 15 - Response to Int. 92 in Docket 031047-TP (CD only)**
7. **Attachment to POD No. 18 -**
 1. **Sprint/Agilent Master Agreement**
 2. **Agilent SOW for the KMC study**
8. **Attachment to POD 20 - CLEC Implementation checklist and account profile**

DOCUMENT NUMBER-DATE

07410 AUG-1 05

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 and designated as Document No. 01781-05 on February 21, 2005.¹ One unredacted version of Attachment to Interrogatory # 13 KMC Call Diagram, Attachment to POD No. 6 - KMC Correlated call Records (CCR) and Attachment to POD No. 7 - IXC Analysis is being filed under separate cover with this request.

3. The information for which the Request is submitted contains proprietary confidential business information. 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.

¹ The following specific documents included in Document No. 01781-05 have already been granted confidential classification by the Commission:

Attachment to POD No. 1 - KMC CDR Records (CD only) - Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP
Access Bypass Study Results - Order No. PSC-05-0542-CFO-TP
KMC Agilent CDR's (CD only) - Order No. PSC-05-0542-CFO-TP

- (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. Section 364.24, Florida Statutes, prohibits a telecommunications company from intentionally disclosing customer account records, except as authorized by the customer or allowed by law.
6. The subject information has not been publicly released by Sprint.

Based on the forgoing, 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 1st day of August, 2005.



Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560
850/878-0777
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
<p>Highlighted portions Interrogatory Nos. 4, 7, 8, 13, and 16</p>	<p>This information is KMC and other customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>Attachment to Interrogatory No. 1 - KMC Complaint Summary (entire document)</p>	<p>This information is KMC customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>Highlighted portions of Attachment to Interrogatory No. 13 - KMC Call Diagram</p>	<p>This information is KMC and other customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>Attachment to POD No. 1 - KMC CDR Records (CD only)</p>	<p>Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP</p>
<p>Highlighted portions of Attachment to POD No. 6 - KMC Correlated call Records (CCR)</p>	<p>This information is KMC customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>

<p>Highlighted portions of Attachment to POD No. 7 - IXC Analysis</p>	<p>This information is KMC and other customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>Attachment to POD No. 15 – Response to Int. 92 in Docket 031047-TP (CD only) (entire CD)</p>	<p>This information is KMC and other customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>Attachment to POD No. 18 –</p> <p>Access Bypass Study Results **already granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP</p> <p>Sprint/Agilent Master Agreement (entire document)</p> <p>Agilent SOW for the KMC study (entire document)</p> <p>KMC Agilent CDR's (CD only) **already granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP</p>	<p>This information is Agilent trade secret information and contractual information the release of which would impair Sprint's ability to contract for good or services on favorable terms. (Section 364.183(3) (a) and (d), F.S.)</p>
<p>Attachment to POD 20 - CLEC Implementation checklist and account profile (entire document)</p>	<p>This information is KMC customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>

Response: Local interconnection trunk groups that KMC has with Sprint LTD are switched circuits. KMC does not exchange traffic over PRI connections from Sprint.

Interrogatory 4: Please provide a detailed identification and quantification of any traffic that Sprint has determined to or believes may have been delivered by KMC to Sprint-FL over local interconnection trunks for which Sprint-FL alleges it was entitled to charge KMC access charges. Quantify the traffic that Sprint-FL alleges was subject to intrastate access charges separately from that which it alleges was subject to interstate access charges.

Response: See CONFIDENTIAL KMC Complaint Summary file, Interstate and Intrastate tabs. The access charges assessed to KMC from July 2002 through November 2004 are as follows:

Jurisdiction	MOU's	Charges
Interstate		
Intrastate		

These charges are netted against the local piece which was initially billed to KMC. The net charges owed by KMC in Florida are [REDACTED] for this period.

Interrogatory 5: State whether Sprint uses charge party number information related to traffic delivered by KMC to determine whether traffic is subject to reciprocal compensation or access charges in addition to calling party number information. If Sprint's response is that it does use charge party number information in this way, please explain in detail Sprint's rationale for doing so. State in detail any reasons why, in Sprint's experience, using charge party number information for the foregoing purpose is inferior to using calling party number information.

Response: Sprint utilizes the Telcordia industry standard for switch record population for calling party number and charge number. Please refer to Response to POD No. 5, Telcordia standard, GR-394-CORE, section 3.2.2.2, E. Calling Party Number/Charge Number.

Interrogatory 6:

(a) Does Sprint believe that KMC has taken any actions that cause the alteration or change of the charge party number parameter in the SS7 signalling for traffic KMC delivers to Sprint-FL for termination? If so,

Sprint conducted a study of SS7 correlated call records and was able to identify traffic that Sprint sent to an IXC and for which the call should have been returned to Sprint from an IXC. However, in these instances, Sprint noted that the call was returned via KMC's local interconnection trunk groups and the charge number was altered or inserted to cause the call to look local. Refer to Sprint's Attachment to Interrogatory No. 1(a).

(b) See Response to POD Nos. 1, 7, 15 and 18.

(c) Sprint analyzed calls from April 19, 2004 by using SS7 correlated call records. IXC calls that should have been returned to Sprint via an IXC trunk group were in fact returned to Sprint via KMC's local interconnection trunk groups. Analysis of the calls demonstrated the following:

The charge number of 239-689-2995, was used for [REDACTED]
[REDACTED]
[REDACTED]

The charge number of 850-201-0579 was used for [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(d) No.

Interrogatory 8: Sprint alleges that it noticed a dramatic change in the pattern and volume of traffic KMC delivered to Sprint-FL for termination beginning on May 22, 2004. Please describe all data and information upon which Sprint bases this conclusion and/or belief.

Response: See CONFIDENTIAL KMC Complaint file, Billed Volume Trend tab. The billed minutes have declined from April 2004 to May 2004 by 46%, [REDACTED] total MOU. The billed minutes result from usage processed from the switch onto the

(b) – (f) Sprint objects to the subparts of this Interrogatory on the grounds that it is not relevant to the subject matter of this action or reasonably calculated to lead to the discovery of admissible evidence. These subparts request information concerning interstate traffic that is not within the jurisdiction of the Commission and which Sprint has excluded from the traffic for which Sprint seeks relief from the Commission pursuant to its Complaint. While the amount of interstate traffic is relevant to the action, because it serves to define the traffic subject to the Commission’s jurisdiction in this proceeding, the detailed information concerning the interexchange traffic that is requested in subparts (b)-(f) is not.

Interrogatory 13: Please describe in detail the basis for Sprint’s allegation that KMC has “made arrangements with various carriers to inappropriately terminate interexchange traffic bound for Sprint[-FL] end users over its local interconnection trunks with Sprint[-FL].”

Response: Using the SS7 call detail and SS7 correlated call detail records, Sprint was able to determine the calling state, the original calling party number, the called number, the charge number, the IXC on the originating calls, and the use of the repetitive charge number regardless of the originating state or originating calling party. Using these parameters, Sprint was able to follow the path of a call where it entered and exited Sprint’s network for calls originating to an IXC to the point when the call reentered Sprint’s network over KMC’s local interconnection trunk group(s).

For example, Sprint noted the following call scenario (see CONFIDENTIAL diagram attached to this Interrogatory):

- A [REDACTED] end user in Quincy, FL, placed a toll call to a Sprint end user in Crawfordville, FL using a presubscribed carrier of [REDACTED] (Carrier Identification Code = [REDACTED])

- The call came into Sprint's Tallahassee tandem from [REDACTED] and Sprint handed the call off to [REDACTED].
- The next leg of the call shows the call returning to Sprint via KMC's local interconnection trunk group to Sprint's Tallahassee tandem to terminate to Sprint's end user.
- Between the time the call was handed to [REDACTED] and returned via KMC's local interconnection trunk group, the charge party number had been changed to 850-201-0579.

Interrogatory 14: Please state whether Sprint IXC has any agreements with the confidential entity KMC identified in its Motion to Dismiss? If so, please describe the purposes of such agreements and the terms and provisions related to any traffic delivered by Sprint IXC to such entity that is destined for termination to the end users of a LEC.

Response: Sprint objects to this Interrogatory on the grounds that it is not relevant to the subject matter of this action or reasonably calculated to lead to the discovery of admissible evidence. The Interrogatory asks for information concerning Sprint's IXC, which is not a party to this action, concerning agreements that Sprint's IXC may have with a provider this it not a party to this action, and concerning traffic terminated by Sprint IXC that is unrelated to the subject matter of this action in that it is not traffic exchanged between KMC and Sprint.

Interrogatory 15: Please describe in detail Sprint's calculation of the amount Sprint-FL alleges that KMC owes to Sprint-FL for allegedly improperly billed Florida intrastate interexchange traffic sent over local connection trunks as asserted in the Complaint, including but not limited to identifying improperly billed and routed traffic and describing the relevant information contained in the call detail records for the same and the fees allegedly owed for each such call or type of calls making up such traffic.

Response: Sprint analyzed the SS7 traffic records to identify interexchange traffic over KMC's local interconnection trunks. Once the trunks are identified, Sprint used

monthly SS7 CDR Summary Reports to calculate the PLU factors using the jurisdiction of the SS7 minutes of use. The jurisdiction of the minutes is based upon the calling party numbers to the called party numbers in the SS7 Call Detail Records. The calculated PLU is then applied to the billed minutes, from CASS (Carrier Access Support System), to determine what should be interstate, intrastate, and local minutes. A true-up is done on the billed usage to determine the difference of what the customer was initially billed for as local and intrastate minutes and the corrected amount to include the additional access charges. An adjustment for the difference amount is then applied to a subsequent bill following the initial billing.

Interrogatory 16: Please describe in detail Sprint's calculation of the amount Sprint-FL alleges that KMC owes Sprint-FL for reciprocal compensation for ISP-bound traffic improperly billed and routed to Sprint as asserted in the Complaint, including but not limited to identifying improperly billed and routed traffic and describing the relevant information contained in the call detail records for the same and the fees allegedly owed for each such call or type of calls making up such traffic.

Response: Sprint's overpayment of [REDACTED] is based on [REDACTED] minutes from 7/02-6/03 of KMC intentionally mischaracterized access traffic, which is the subject of the complaint. The mischaracterized traffic was treated by KMC as local traffic and routed to Sprint to be terminated locally by Sprint. Sprint unknowingly billed misrepresented access traffic to KMC as local minutes and rated (\$.006467) them as local voice minutes.

The compensation regime called for in the FCC ISP Remand Order (FCC 01-131) allows KMC to be compensated by Sprint at three times (3:1 ratio) the amount of local traffic Sprint bills to KMC, each billing the other at voice rates for this

presumed voice traffic. See paragraph 79 of the Order for further details. By misrouting and mischaracterizing access traffic as local traffic, minutes-of-use included in KMC's local traffic terminating to Sprint was grossly inflated by [REDACTED] minutes. KMC inflated the amount of local terminated reciprocal compensation minutes by way of arbitraging access traffic, and as a result, Sprint unknowingly overpaid 3 times the volume of voice minutes ([REDACTED] minutes X 3 = [REDACTED] X \$0.006467 = [REDACTED]).

Also, refer to Sprint's response to Interrogatory No. 15, and see

CONFIDENTIAL KMC Complaint Summary file, Jul02-Jun03 Impact tab.

Interrogatory 17:

- (a) What percentage of intrastate interexchange traffic in Florida that is carried by Sprint IXC originates on Sprint-FL's network?**
- (b) What percentage of interstate interexchange traffic terminating in Florida (with any local exchange carrier) that is carried by Sprint IXC (i.e., for which Sprint IXC charges an end user customer) originates at a local exchange carrier that is a Sprint affiliate or subsidiary?**
- (c) What percentage of intrastate interexchange traffic in Florida that is carried by Sprint IXC (i.e., for which Sprint IXC charges an end user customer) is delivered by Sprint IXC directly to a provider other than a local exchange carrier, whether such provider is another IXC, an enhanced services provider, or an information services provider?**
- (d) What percentage of interstate interexchange traffic that terminates in Florida that is carried by Sprint IXC (i.e., for which Sprint IXC charges an end user customer) is delivered by Sprint IXC directly to a provider other than a local exchange carrier, whether such provider is another IXC, an enhanced services provider, or an information services provider?**
- (e) For traffic the percentages of which are given in (c) and (d), please describe the contractual commitments Sprint IXC has with providers to which it delivers traffic to identify the jurisdiction of the traffic sent by Sprint IXC for delivery (whether direct or indirect) to the terminating LEC and to forward all calling records and signaling information without manipulation.**

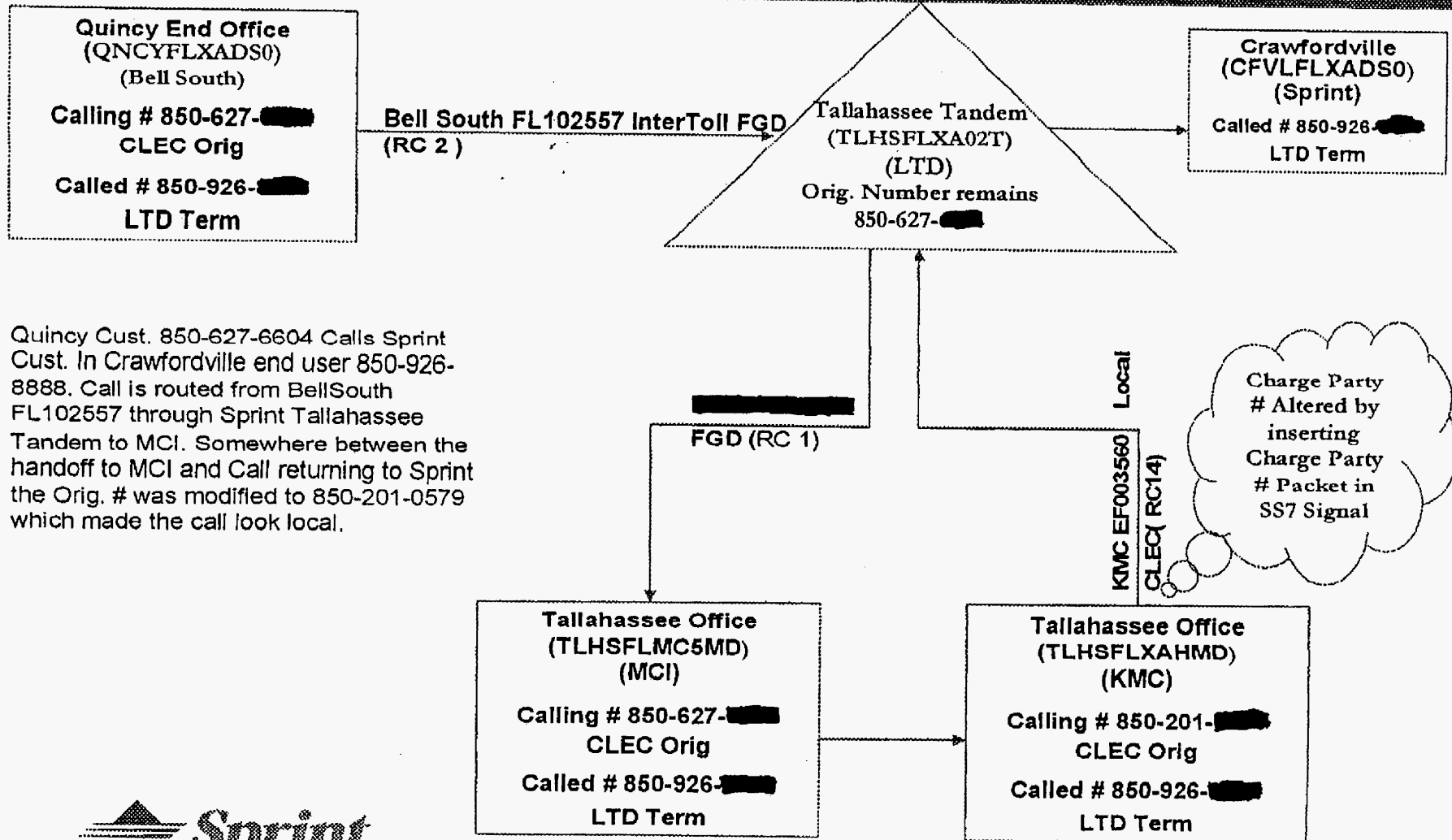
Response: Sprint objects to this Interrogatory, including all subparts (a) through (e) on the grounds that it is not relevant to the subject matter of this action or reasonably

Attachment For Interrogatory No. 1

CONFIDENTIAL

KMC Complaint Summary

KMC-Tracking Fraudulent Activity



Quincy Cust. 850-627-6604 Calls Sprint Cust. In Crawfordville end user 850-926-8888. Call is routed from BellSouth FL102557 through Sprint Tallahassee Tandem to MCI. Somewhere between the handoff to MCI and Call returning to Sprint the Orig. # was modified to 850-201-0579 which made the call look local.



CONFIDENTIAL

KMC CDR Records
On CD only

KMC-Tracking Fraudulent Activity

1 State 2 LATA (IS2L) Information

ACNA	CIC	OPC	PRC	Transit	Day	Charge	Calling	Called	D	IS Code	ISIC	Date/Time	Duration	ISN	Carrier	Select	CD
		223-14-1	230-11-2	T		850-827-	850-827-	850-926-	T	FL102557	1156	23:45.2	226.742	850-926-	Carrier preselected		
		230-11-2	244-2-18	T		850-827-	850-827-	850-926-	O	CF222014	120	23:45.4	227.023	850-926-	Carrier preselected		
KMM		244-2-18	230-11-2	F		850-201-	850-827-	850-926-	T	EF003560	3021	23:47.0	228.101	850-926-	No indication		

Source: Avilent SS7

Above is an actual FL 1S2L, non-ISP, Correlated Call Record (CCR). The JIP of 850205 was only included on the last leg of the call. The Correlation ID is 61335.

ISOC	HOST	ICL	CC	IC	ITL	MOD	ORIG	S	R	TERM	IS	ISDT	POST	DT	AGXH	Z	TGN	Z	BMID	CGNA	AGNA	Z	SWID
FL102557	QNCYFLXA	PH	5	4	DT		QNCYFLXADS0	7	7	FL102557	204	10/26/1996		37397			1021	TRK					QNCY627DDTC
CF222014	TLHSFLXADS0	DF	-	4	TD		TLHSFLXADS0	7	7	TLHSFLXADS0	192	1/8/1998	10-Jun-03				458	TRK					
EF003560	TLHSFLXADS0	DF	-	4	TG	KMM	TLHSFLXADS0	7	-	TLHSFLXADS0	576	9/23/1998	19-Feb-03	KMM		1335	TRK	KMM	KMM			KMC_INTRA	

Source: Network National Trunk Group Report

Above is the detailed trunk information identified from the CCR, taken from the NTGR.



KMC-Tracking Fraudulent Activity

Quincy End Office
 (QNCYFLXAD80)
 (Bell South)
 Calling # 850-627-
 CLEC Orig
 Called # 850-926-
 LTD Term

Bell South FL102557 InterToll FGD
 (RC 2)

Tallahassee Tandem
 (TLHSEFLXAD71)
 (KMC)
 Calling # 850-201-
 CLEC Orig
 Called # 850-926-

Tallahassee Tandem
 (TLHSEFLXAD71)
 (KMC)
 Calling # 850-201-
 CLEC Orig
 Called # 850-926-

Quincy Cust. 850-627- Calls Sprint
 Cust. In Crawfordville end user 850-926-
 Call is routed from BellSouth
 FL102557 through Sprint Tallahassee
 Tandem to Somewhere between the
 handoff to and Call returning to Sprint
 the Orig. # was modified to 850-201-
 which made the call look local.

FGD (RC 1)

Local

KMC EF003560
 CLEC(RC14)

Charge Party
 # Altered by
 inserting
 Charge Party
 # Packet in
 SS7 Signal

Tallahassee Office
 (TLHSEFLMC5MD)
 (KMC)
 Calling # 850-627-
 CLEC Orig
 Called # 850-926-
 LTD Term

Tallahassee Office
 (TLHSEFLXAHMD)
 (KMC)
 Calling # 850-201-
 CLEC Orig
 Called # 850-926-
 LTD Term



KMC-Tracking Fraudulent Activity

2 State 2 LATA (2S2L) Information

AGNA	CIC	ORC	DRG	ST	SI	File	Chrg	Call	Call	Dir	IS	Code	T	Cic	Date	Time	Duration	JIP
KMM		244-2-16	230-11-2	KS	FL	F	850-201-0579	785-841	850-422	T	EF003560		62		11:51.4	292.876	850-320	
		230-11-2	254-52-77	KS	FL	T	850-201-0579	785-841	850-422	O	EF006521		1301		11:51.6	293.204	850-320	

Source: Agilent SS7

Above is an actual FL 2S2L, non-ISP, CCR. The JIP of 850205 was used. The Correlation ID is 59009

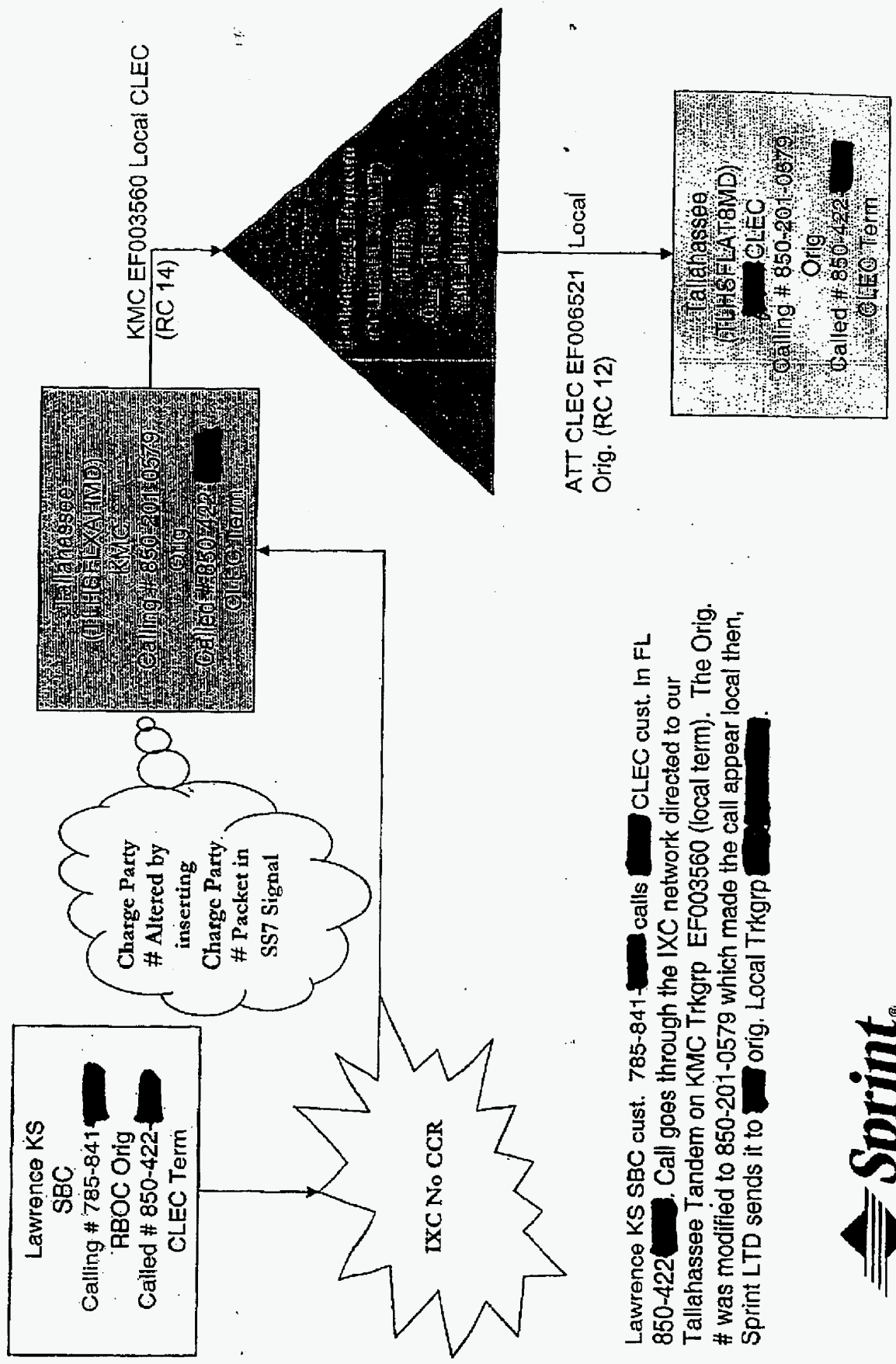
ISCI	HOST	LOC	OC	TC	MOD	ORIG	SI	SI	ISDATE	CAPACITY	ALOK	ASKN	ASMB	Z	EXE	Z	SMID	PCNA	AGNA	ABWID
EF003560	TLHSFLXADS0	DF	-	4	TG	KMM	7	7	8/23/1998	17476	KMM					1335	TRK	KMM	KMM	
EF006521	TLHSFLXA02T	DF	4	-	TG		7	7	9/7/1999	607		1483	TRK							

Source: Network National Trunk Group Report

Above is the detailed trunk information identified from the CCR, taken from the NTGR.



KMC-Tracking Fraudulent Activity



Lawrence KS SBC cust. 785-841- calls CLEC cust. In FL 850-422-. Call goes through the IXC network directed to our Tallahassee Tandem on KMC Trkgrp EF003560 (local term). The Orig. # was modified to 850-201-0579 which made the call appear local then, Sprint LTD sends it to orig. Local Trkgrp



Chris Schaffer National Network Engineering
 Sprint Restricted
 11/11/03

Findings..... [REDACTED] & KMC at Fault?

- The CIC disappears from the call record when the call is switched to the terminating switch
- There appears to be no technical reason for [REDACTED] to be handing the traffic off to KMC to come to a Sprint End User (refer to page 2)
- Traffic terminating in this manner and with these characteristics are billed as Local Recip Comp rather than Switched Access



Financial Impacts from Fraudulent Activity

- Actual Revenue Impact (July 02 – August 03) (Appendix B)
 - Florida
 - \$ [REDACTED]
 - North Carolina
 - (\$ [REDACTED])
 - Tennessee
 - \$ [REDACTED]
- Billing will occur for fraudulent traffic
 - Florida and Tennessee only



Other Miscellaneous Revenue Findings

- AMA not recording
 - \$ [REDACTED] (annualized) (source: Ryan Gfeller 9/03)
 - Recording turned on 09/2003
 - 2 trunk groups
- Traffic Routing/Configuration Issues
 - \$ [REDACTED] (estimated annualized) (see appendix D1)
- Trunk Group Anomalies
 - \$ [REDACTED] (estimated annualized) (see appendix D2)

Total Annualized opportunity \$ [REDACTED]



KMC-Tracking Fraudulent Activity

Appendix A

Example Of SS7 Call Detail Records (CDR's)

ACNA	CIC	Call Cat	Calling ST	Called ST	Transit	CPN FCharge #	Calling #	Called #	J/P (Jurisd) Direction	TS Code	T Cic	Date/Time	Duration
KMM		2S2L	NV	FL	T	F 850-201-0579	702-300-	850-566-	850205 T	EF003560	180	43:48.9	230.555
KMM		2S2L	IL	FL	F	F 850-201-0579	312-953-	850-410-	850205 T	EF003560	225	21:13.8	285.818
KMM		2S2L	IL	FL	T	F 850-201-0579	815-982-	850-284-	850205 T	EF003560	33	05:30.9	41.991
KMM		2S2L	KY	FL	T	F 850-201-0579	859-232-	850-980-	850205 T	EF003560	233	08:01.7	6.414
KMM		2S2L	NC	FL	F	F 850-201-0579	828-295-	850-844-	850205 T	EF003560	248	48:11.9	144.374
KMM		2S2L	MN	FL	F	F 850-201-0579	952-846-	850-245-	850205 T	EF003560	3226	02:41.8	65.402
KMM		2S2L	NJ	FL	T	F 850-201-0579	873-208-	850-566-	850205 T	EF003560	278	17:43.8	91.99
KMM		2S2L	VA	FL	T	F 850-201-0579	571-221-	850-566-	850205 T	EF003560	3239	57:37.3	1268.223
KMM		2S2L	TX	FL	F	F 850-201-0579	214-340-	850-921-	850205 T	EF003560	3028	03:07.9	51.823
KMM		2S2L	GA	FL	T	F 850-201-0579	229-228-	850-251-	850205 T	EF003560	3152	18:44.7	4.158
KMM		2S2L	NJ	FL	T	F 850-201-0579	732-310-	850-566-	850205 T	EF003560	228	07:08.8	19.741
KMM		2S2L	MS	FL	T	F 850-201-0579	601-582-	850-567-	850205 T	EF003560	3089	47:59.4	3.218
KMM		2S2L	NC	FL	T	F 850-201-0579	336-545-	850-566-	850205 T	EF003560	118	46:58.6	187.217
KMM		2S2L	GA	FL	F	F 850-201-0579	229-227-	850-552-	850205 T	EF003560	1	02:19.6	1819.719
KMM		2S2L	CA	FL	T	F 850-201-0579	909-874-	850-566-	850205 T	EF003560	220	05:07.8	48.528
KMM		2S2L	NY	FL	T	F 850-201-0579	718-327-	850-321-	850205 T	EF003560	62	41:03.6	951.597
KMM		2S2L	NY	FL	T	F 850-201-0579	917-912-	850-264-	850205 T	EF003560	3278	40:42.2	645.911
KMM		2S2L	NC	FL	T	F 850-201-0579	828-446-	850-566-	850205 T	EF003560	116	38:50.9	43.753
KMM		2S2L	MI	FL	T	F 850-201-0579	313-492-	850-566-	850205 T	EF003560	3196	33:54.9	231.644
KMM		2S2L	GA	FL	F	F 850-201-0579	229-220-	850-385-	850205 T	EF003560	3086	08:28.3	997.472
KMM		2S2L	MI	FL	F	F 850-201-0579	248-557-	850-575-	850205 T	EF003560	241	17:52.5	67.575
KMM		2S2L	GA	FL	T	F 850-201-0579	404-312-	850-566-	850205 T	EF003560	3176	19:57.7	17.79

Note: the same Charge Party Number is used in all calls that have different calling party numbers regardless of the origination point



KMC-Tracking Fraudulent Activity

Appendix B KMC CLEC PLU Estimated Back Billing

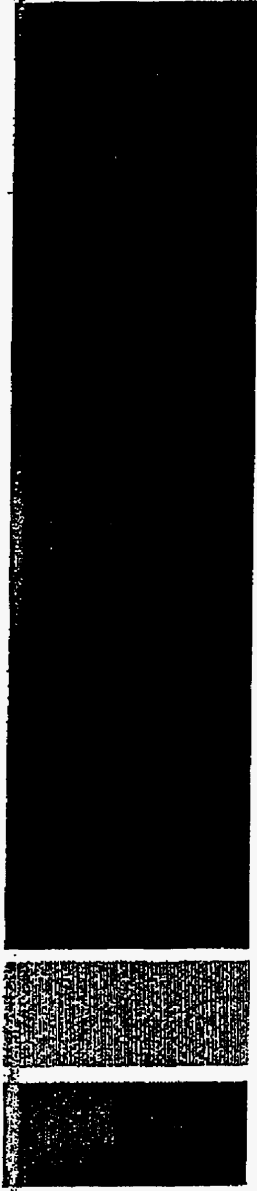
Sprint LTD - KMC Telecom
CLEC PLU Estimated Backbilling
For the period of July 2002 to August 2003

Month	FL - Co 27	FL - Co 39	NC - 56	TN - 18	Total
July 02	\$	\$	\$	\$	\$
August 02	\$	\$	\$	\$	\$
September 02	\$	\$	\$	\$	\$
October 02	\$	\$	\$	\$	\$
November 02	\$	\$	\$	\$	\$
December 02	\$	\$	\$	\$	\$
January 03	\$	\$	\$	\$	\$
February 03	\$	\$	\$	\$	\$
March 03	\$	\$	\$	\$	\$
April 03	\$	\$	\$	\$	\$
May 03	\$	\$	\$	\$	\$
June 03	\$	\$	\$	\$	\$
July 03	\$	\$	\$	\$	\$
August 03	\$	\$	\$	\$	\$
Total	\$	\$	\$	\$	\$



Ppd by Sonia Diedel

Chris Schaffer National Network Engineering
Sprint Restricted
11/11/03

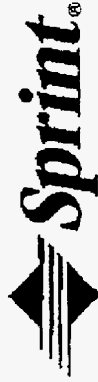


IXC Analysis

Investigating KMC, [REDACTED] and [REDACTED] local trunk group call records to help identify VOIP traffic

Procedures to Identify IXC Carriers

- Identified CLEC carriers previously investigated that inserted or altered Charge Party Number information that changes call jurisdiction
 - KMC, [REDACTED] and [REDACTED]
- Requested Agilent ss7 Correlated Call Records captured from the CLECs local traffic trunks
 - 4/19/04 was chosen because it was prior to the VOIP ruling (Docket No. 02-361) released on 4/21/04
- Extracted the inter/intrastate data from the correlated records
- Captured all CICs and IXC trunk groups that were identified in the correlation that is routing the IXC traffic to the CLEC carriers
- Summarized total calls and usage by carrier



2/21/2005

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ppd by Chris Schaffer
LTD Network Engineering

KMC Summary

Carrier	Data from 4/19	Total (Duration In Seconds)	% of Calls	% of Usage
	Total Number of Calls	186	39.6%	
	Sum of Duration	57,040		38.2%
	Total Number of Calls	153	32.6%	
	Sum of Duration	65,222		43.7%
	Total Number of Calls	50	10.6%	
	Sum of Duration	7,128		4.8%
	Total Number of Calls	48	10.2%	
	Sum of Duration	11,810		7.9%
	Total Number of Calls	24	5.1%	
	Sum of Duration	5,483		3.7%
	Total Number of Calls	4	0.9%	
	Sum of Duration	248		0.2%
	Total Number of Calls	2	0.4%	
	Sum of Duration	1,887		1.3%
	Total Number of Calls	2	0.4%	
	Sum of Duration	147		0.1%
	Total Number of Calls	1	0.2%	
	Sum of Duration	314		0.2%
Total Count of Carrier		470		
Total Sum of Duration		149,278		

* Note Total Number of Calls represent calls captured with CIC



2/21/2005

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AT&T Summary

Carrier	Data from 4/19	Total (Duration in Seconds)	% of Calls	% of Usage
[REDACTED]	Total Number of Calls	3,237	97.5%	
	Sum of Duration	647,072		97.0%
[REDACTED]	Total Number of Calls	67	2.0%	
	Sum of Duration	17,754		2.7%
[REDACTED]	Total Number of Calls	11	0.3%	
	Sum of Duration	1,390		0.2%
[REDACTED]	Total Number of Calls	3	0.1%	
	Sum of Duration	418		0.1%
[REDACTED]	Total Number of Calls	1	0.0%	
	Sum of Duration	111		0.0%
[REDACTED]	Total Number of Calls	1	0.0%	
	Sum of Duration	28		0.0%
[REDACTED]	Total Number of Calls	1	0.0%	
	Sum of Duration	43		0.0%
Total Calls Captured		3,321		
Total Sum of Duration		666,816		

* Note Total Number of Calls represent calls captured with CIC



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Time Warner

Carrier	Data from 4/19	Total (Duration in Seconds)	% of Calls	% of Usage
[REDACTED]	Total Number of Calls	181	41.9%	
[REDACTED]	Sum of Duration	33,047		28.5%
[REDACTED]	Total Number of Calls	128	29.6%	
[REDACTED]	Sum of Duration	58,922		50.8%
[REDACTED]	Total Number of Calls	42	9.7%	
[REDACTED]	Sum of Duration	8,129		7.0%
Sprint	Total Number of Calls	31	7.2%	
[REDACTED]	Sum of Duration	5,967		5.1%
[REDACTED]	Total Number of Calls	7	1.6%	
[REDACTED]	Sum of Duration	1,276		1.1%
[REDACTED]	Total Number of Calls	7	1.6%	
[REDACTED]	Sum of Duration	388		0.3%
[REDACTED]	Total Number of Calls	3	0.7%	
[REDACTED]	Sum of Duration	780		0.7%
[REDACTED]	Total Number of Calls	1	0.2%	
[REDACTED]	Sum of Duration	23		0.0%
[REDACTED]	Total Number of Calls	1	0.2%	
[REDACTED]	Sum of Duration	554		0.5%
[REDACTED]	Total Number of Calls	31	7.2%	
[REDACTED]	Sum of Duration	6,926		6.0%
Total Calls Captured		432		
Total Sum of Duration		116,012		

* Note Total Number of Calls represent calls captured with CIC



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KMC Charge Party Number usage

Charge #	Carrier	Total Calls	% of Total Correlated Calls
239-689-2995	[REDACTED]	1	
	[REDACTED]	77	
	[REDACTED]	2	
	[REDACTED]	1	
	[REDACTED]	75	
	[REDACTED]	6	
239-689-2995 Total		162	33%
850-201-0579	[REDACTED]	45	
	[REDACTED]	101	
	[REDACTED]	2	
	[REDACTED]	37	
	[REDACTED]	1	
	[REDACTED]	2	
	[REDACTED]	76	
	[REDACTED]	1	
	[REDACTED]	17	
850-201-0579 Total		282	58%

* Did not include all altered Charge Party Numbers just the two most frequently used



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AT&T Charge Party Number usage

Charge #	Carrier	Total Calls	% of Total Correlated Calls
407-552-██████████	██████████	2	
		453	
		11	
407-552-██████████ Total		466	14%
407-563-██████████	██████████	10	
		2870	
		57	
		3	
		1	
407-563-██████████ Total		2941	86%

* Did not include all altered Charge Party Numbers just the two most frequently used



2/21/2005

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Time Warner Charge Party Number usage

Charge #	Carrier	Total Calls	% of Total Correlated Calls
386-878- [REDACTED]	[REDACTED]	4	
		18	
		5	
		1	
386-878-0116 Total		28	6%
407-210- [REDACTED]	[REDACTED]	38	
		3	
		163	
		7	
		7	
		1	
		1	
		31	
		123	
		30	
407-210- [REDACTED] Total		404	87%

* Did not include all altered Charge Party Numbers just the two most frequently used



2/21/2005

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**Response to Interrogatory No. 92 in Docket No.
031047-TP**

On CD only

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Sprint/Agilent Master Agreement

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Agilent SOW for the KMC study

CONFIDENTIAL

KMC Agilent CDR's *on CD only*

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CLEC Implementation Checklist and Account Profile

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaint of Sprint-Florida, Incorporated) Docket No. 041144-TP
Against KMC Telecom III LLC,)
KMC Telecom V, Inc. and KMC Data LLC,)
for failure to pay intrastate)
Access charges pursuant to its interconnection)
Agreement and Sprint's tariffs and for violation of) Filed: August 1, 2005
Section 364.16(3)(a), Florida Statutes.)
_____)

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

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 confidential and proprietary as set forth in Attachment A. Sprint previously filed a Claim of Confidentiality related to this information and is filing this request pursuant to Rule 25-22.006, F.A.C. The following documents or excerpts from documents are the subject of this request:

1. Attachment to POD Nos. 6 & 7 - Internal Sprint Emails and Related attachments (tgsn_EF290624, KMCRC1405052004, KMC09102003, KMC022504, ef003560 cdrS, and EF290624 on CD only)
2. Supplemental Attachment to POD #12 - E-mails relating to reciprocal compensation overpayment
3. Supplemental Attachment to POD #15 (Spreadsheets)
4. Supplemental Attachment to POD #15 Open/Pending Issues Report SO (Southern.csv on CD only),
5. Supplemental Attachment to POD #15 Open/pending Issues Report MAO
6. Supplemental Attachment to POD #15 ccrkmc 041904.xls (on CD only), and Southern CDRs 8_6_04 (on CD only)

2. Two redacted copies of the information are attached to this request. One unredacted copy of the information was filed under separate cover and designated Document No. 02678-05 on March 17, 2005.¹

3. The information for which the Request is submitted contains information that is proprietary confidential business information. 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.

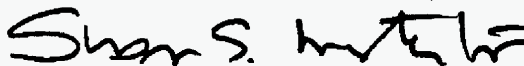
¹ The following specific documents included in Document No. 01781-05 have already been granted confidential classification by the Commission:

20040202-20031118 EST KMM CLEC CDR'S (on CD only) – Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP
20031024-20030711 GMT KMM CLEC CDR'S (on CD only) – Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP

- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.
5. Section 364.24, Florida Statutes, prohibits a telecommunications company from intentionally disclosing customer account records, except as authorized by the customer or allowed by law.
6. The subject information has not been publicly released by Sprint.

Based on the forgoing, 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 1st day of August, 2005.



Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560
850/878-0777
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
<p>Internal Sprint Emails and Related attachments (tgsn_EF290624, KMCRC1405052004, KMC09102003, KMC022504, ef003560 cdrS, and EF290624 on CD only)</p> <p>(entire document)</p>	<p>This information is KMC customer account information involving internal e-mails discussing KMC account activity that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
<p>20040202-20031118 EST KMM CLEC CDR'S (on CD only)</p>	<p>Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and Order No. PSC-05-0648-CFO-TP</p>
<p>20031024-20030711 GMT KMM CLEC CDR'S (on CD only)</p>	<p>Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and Order No. PSC-05-0648-CFO-TP</p>
<p>Supplemental Attachment to POD #12 (entire document)</p>	<p>This information is KMC customer account information involving internal e-mails discussing KMC account activity that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>

<p>Supplemental Attachment to POD #15 (Spreadsheets, Open/Pending Issues Report SO (Southern.csv on CD only), Open/pending Issues Report MAO, ccrkmc 041904.xls (on CD only), and Southern CDRs 8_6_04 on CD only)</p>	<p>This information is KMC customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.</p>
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**INTERNAL SPRINT
EMAILS & RELATED
ATTACHMENTS**

**(Attachment tgsn_EF290624, KMCRC
1405052004, KMC09102003,
KMC022504, ef003560 cdrS, and
EF290624 on CD only)**

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**E-mails relating to reciprocal compensation
overpayment**

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**Supplemental Attachment to POD 15
(spreadsheets)**

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**Supplement Attachment to POD 15
Open/pending Issues Report SO
(Southern.csv on CD only)**

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**Supplement Attachment to POD 15
Open/Pending Issues Report MAO**

CONFIDENTIAL

**(ccrkmc 041904.xls & Southern CDRs
8_6_04 on CD only)**