

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED
MURPHY, CHARLES W.
NOV 17 2010

DATE: November 17, 2010

TO: Charles W. Murphy, Senior Attorney, Office of the General Counsel

FROM: *Frank* Frank Trueblood, Regulatory Analyst, Division of Regulatory Analysis

RE: Petition for arbitration of interconnection agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P., Docket No. 100176-TP and Petition for arbitration of interconnection agreement Between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. Nextel Partners, Docket No. 100177-TP.

On October 27, 2010, Sprint submitted a Request for Confidential Classification for exhibits listed in Document Nos. 08383-10 and 08954-10. They include:

1. Exhibit RGF-2, CDMA and iDEN Maps that illustrates Florida Sprint PCS wireless network and a CD ROM;
2. Exhibit RGF-3, Results of Sprint's Traffic Studies for Florida that show the results of three Florida traffic studies performed by Sprint to identify the percent of Sprint-originated mobile-to-land interMTA traffic delivered by Sprint to AT&T over local interconnection trunks;
3. Exhibit RGF-5, Sprint's Traffic Studies for Florida and Tennessee that include data from Sprint traffic studies showing minutes of use delivered and transited to Sprint by AT&T over interconnection facilities during a specified time period;
4. Exhibit GA DR-3, Sprint's Response to AT&T Georgia's First Set of Discovery in Georgia PSC Dockets 31691 and 31692 that shows tickets opened by Sprint in 2010 regarding electronic invoice transmission files not timely received from AT&T; and
5. Exhibit A-5, Portions of the Rebuttal Testimony of AT&T witness James W. Hamiter that identify Sprint CLEC-specific network configuration information, which reveals statewide where Sprint CLEC services are likely to exist and where they are likely to be more concentrated.

COM _____
 APA _____
 ECR _____
 GCL _____
 RAD _____
 SSC _____
 ADM _____
 OPC _____
 CLK *Pená*

DOCUMENT NUMBER-DATE

09469 NOV 17 2010

FPSC-COMMISSION CLERK

Memorandum to Charles Murphy
Page Two
November 17, 2010

Sprint maintains that the information listed in its request has not been generally disclosed and public disclosure of such would cause competitive harm to Sprint and provide competitors with an unfair advantage in the market place. The information is proprietary and confidential business information that Sprint seeks to keep confidential pursuant to Section 364.183(1), Florida Statutes (F.S.) and Rule 25.22.006, Florida Administrative Code (F.A.C.)

Based upon my review, the information meets the requirements for confidential classification pursuant to Section 364.183, F.S., and should be treated as confidential pursuant to Section 119.07, F.S.

/ft

cc: Brenda Merritt, Statistician II, Division of Regulatory Analysis
Kim Pena, Records Management Assistant, Office of Commission Clerk

RUTLEDGE, ECENIA & PURNELL

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

2010 OCT 28 AM 10:04

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October 27, 2010

By Hand Delivery

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED
10 OCT 27 PM 2:05
COMMISSION
CLERK

Re: Docket 100176-TP (Petition for Arbitration of Interconnection Agreement Between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company Limited)

Docket 100177-TP (Petition for Arbitration of Interconnection Agreement Between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum Limited Partnership, Nextel South Corp., and NPCR, Inc. d/b/a Nextel Partners)

Dear Ms. Cole:

Enclosed for filing in the above-referenced dockets on behalf of Sprint Communications Company Limited, Sprint Spectrum Limited Partnership, Nextel South Corp., and NPCR, Inc. d/b/a Nextel Partners (collectively, "Sprint") please find the following:

1. Original and five copies of Sprint's First Request for Confidential Classification; including Exhibits A1 through A-5 and Exhibit C; and
2. An envelope containing Confidential Exhibits B-1 through B-5.

COM _____
 APA _____
 ECR _____
 GCL 1
 RAD 3
 SSC _____
 ADM _____
 OPC _____
 CLK *Fena*

____ CLAIM OF CONFIDENTIALITY
 ____ NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
 ____ FILED BY OPC
 FOR DN 08953-10, WHICH
 IS IN LOCKED STORAGE. YOU MUST BE
 AUTHORIZED TO VIEW THIS DN. - CLK

DOCUMENT NUMBER DATE
 08953 OCT 27 e
 FPSC-COMM3810-1010

October 27, 2010

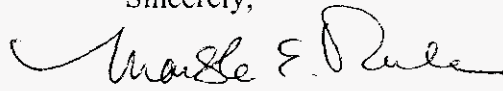
Page 2

As set forth in Sprint's First Request for Confidential Classification, Sprint claims the highlighted portions of the paper copies of Confidential Exhibits B-1 through B-5 and the entire CD included in Exhibit B-1 as confidential and proprietary business information belonging to Sprint that should be kept confidential and exempt from public disclosure.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing and please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Marsha E. Rule".

Marsha E. Rule

Enclosures

cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for arbitration of interconnection agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Communications Company L.P.

DOCKET NO. 100176-TP

2010 OCT 29 AM 10:31
DIVISION OF
REGULATORY COMPLIANCE

In re: Petition for arbitration of interconnection agreement between BellSouth Telecommunications, Inc. d/b/a AT&T Florida and Sprint Spectrum L.P., Nextel South Corp. and NPCR, Inc. d/b/a Nextel Partners.

DOCKET NO. 100177-TP

FILED: October 27, 2010

SPRINT'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint PCS"), Nextel South Corp. ("Nextel"), NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners"), and Sprint Communications Company Limited Partnership (collectively "Sprint"), and pursuant to §364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of the information and documents described below. As grounds for its request, Sprint states as follows:

1. Section 364.183, Florida Statutes, provides that information which meets certain criteria is exempt from public disclosure under §119.07, Florida Statutes. Section §364.183 defines "proprietary confidential business information" as follows:

(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.

The categories listed in paragraphs (a)-(f) are not exhaustive. Information that does not fall within such paragraphs may nevertheless be confidential under subsection (3). *Florida Power & Light Co. v. Florida Public Service Commission*, 31 So.3d 860 (Fla. 1st DCA 2010)(construing substantially the same language in Section 366.093, Florida Statutes).

Confidential Exhibit RGF-2 of Randy G. Farrar

2. On August 25, 2010, Sprint filed the direct testimony of its witness Randy G. Farrar, including Confidential Exhibit RGF-2 (Florida CDMA & iDEN Maps), which was received by the Commission under a claim of confidentiality pursuant to Section 364.183(1), Florida Statutes and provided to AT&T pursuant to the parties' protective agreement. A copy of the redacted paper version of Exhibit RGF-2 is attached hereto as **Exhibit A-1**. A highlighted copy of the unredacted paper version and a corresponding CD version of Exhibit RGF-2 are submitted separately as **Confidential Exhibit B-1**. Also attached: **Exhibit C**, which is a table containing the justification for confidential classification of the information highlighted in Confidential Exhibit B-1 and other Confidential Exhibits referenced herein.

3. Confidential Exhibit RGF-2 illustrates the Florida Sprint PCS wireless network. Page 1 illustrates the CDMA (i.e.; Sprint) network, while Page 2 illustrates the iDEN (i.e., Nextel) network. This information, which is not available to the public, should remain

confidential in order to maintain the security of the nation's communications infrastructure, and further, is proprietary confidential business information and a trade secret within the meaning of §364.183(a) and (e), Florida Statutes. The information is intended to be, and has been, treated by Sprint as confidential, and its disclosure would impair Sprint's competitive business interests. This information is commercially valuable, in that it would permit competitors to pinpoint and target locations where Sprint's network is vulnerable to competition, thus affording Sprint's competitors an artificial advantage in their ability to compete with Sprint and disadvantaging Sprint and its shareholders.

Confidential Exhibit RGF-3 of Randy G. Farrar

4. On August 25, 2010, Sprint filed the direct testimony of its witness Randy G. Farrar, including Confidential Exhibit RGF-3 (Results of Sprint's Traffic Studies for Florida), which was received by the Commission under a claim of confidentiality pursuant to Section 364.183(1), Florida Statutes and provided to AT&T pursuant to the parties' protective agreement. A copy of the redacted version of Exhibit RGF-3 is attached hereto as **Exhibit A-2**. A highlighted copy of the unredacted version of Exhibit RGF-3 is submitted separately as **Confidential Exhibit B-2**. **Exhibit C** includes the justification for confidential classification of the information highlighted in the Confidential Exhibit s attached hereto.

5. Confidential Exhibit RGF-3 shows the results of three Florida traffic studies performed by Sprint to identify the percent of Sprint-originated mobile-to-land interMTA traffic delivered by Sprint to AT&T over local interconnection truck groups. This information, which is not available to the public, is proprietary confidential business information and a trade secret within the meaning of §364.183(a) and (e), Florida Statutes. The information is intended to be,

and has been, treated by AT&T and Sprint as confidential, and its disclosure would impair Sprint's competitive business interests. This information is commercially valuable traffic flow and volume data that could assist competitors in developing competitive strategies against Sprint, thus affording Sprint's competitors an unfair advantage and disadvantaging Sprint and its shareholders.

Confidential Exhibit RGF-5 of Randy G. Farrar

6. On October 6, 2010, Sprint filed the rebuttal testimony of its witness Randy G. Farrar, including Confidential Exhibit RGF-5 (Sprint Traffic Studies for FL and TN), which was received by the Commission under a claim of confidentiality pursuant to Section 364.183(1), Florida Statutes and provided to AT&T pursuant to the parties' protective agreement. A copy of the redacted version of Exhibit RGF-5 is attached hereto as **Exhibit A-3**. A highlighted copy of the unredacted version of Exhibit RGF-5 is submitted separately as **Confidential Exhibit B-3**. **Exhibit C** includes the justification for confidential classification of the information highlighted in the Confidential Exhibits attached hereto.

7. Confidential Exhibit RGF-5 reveals data derived from Sprint traffic studies that show minutes of use delivered and transited to Sprint by AT&T over interconnection facilities during a specified time period. This information, which is not available to the public, is proprietary confidential business information and a trade secret within the meaning of §364.183(a) and (e), Florida Statutes, and proprietary carrier network information pursuant to 47 U.S.C. § 222(b) which Sprint is obligated to protect. The information is intended to be, and has been, treated by AT&T and Sprint as confidential, and its disclosure would impair Sprint's competitive business interests. This information is commercially valuable traffic flow and

volume data that could assist competitors in developing competitive strategies against Sprint, thus affording Sprint's competitors an artificial advantage in their ability to compete with Sprint and disadvantaging Sprint and its shareholders.

Sprint Confidential Attachment GA DR-3

8. On October 5, 2010, pursuant to Order No. PSC-10-0481-PCO-TP, Sprint provided Commission Staff with a copy of its response to AT&T Georgia's first set of discovery requests in Georgia PSC Dockets 31691 and 31692, except for a portion of such response, which was received by the Commission under a claim of confidentiality pursuant to Section 364.183(1), Florida Statutes and provided to AT&T pursuant to the parties' protective agreement. A copy of the redacted version of Confidential Attachment GA DR-3 is attached hereto as **Exhibit A-4**. A highlighted copy of the unredacted version of Confidential Attachment GA DR-3 is submitted separately as **Confidential Exhibit B-4**. **Exhibit C** includes the justification for confidential classification of the information highlighted in the Confidential Exhibits attached hereto.

9. Confidential Attachment GA DR-3 is a spreadsheet of tickets opened by Sprint in 2010 regarding electronic invoice transmission files that were not timely received from AT&T. This information, which is not available to the public, is proprietary confidential business information and a trade secret within the meaning of §364.183(a) and (e), Florida Statutes, and proprietary carrier network information pursuant to 47 U.S.C. § 222(b) which Sprint is obligated to protect. The information is intended to be, and has been, treated by Sprint as confidential, and its disclosure would impair Sprint's competitive business interests and possibly that of AT&T. This information is commercially valuable, in that it identifies internal confidential communications and transactions (including specific applications utilized) between Sprint and

AT&T, thus affording Sprint's competitors an artificial advantage in their ability to compete with Sprint and disadvantaging Sprint and its shareholders.

Rebuttal Testimony of AT&T Witness James W. Hamiter

10. On October 6, 2010, AT&T Florida filed its Rebuttal Testimony of James W. Hamiter in this docket, along with a Notice of Intent to Request Specified Confidential Classification in order to provide Sprint an opportunity to claim confidential classification of certain information contained in such testimony. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, this Request is filed within 21 days from the date AT&T filed its Notice of Intent. A copy of the redacted version of Page 4 of Mr. Hamiter's Rebuttal Testimony is attached hereto as **Exhibit A-5**. A highlighted copy of the unredacted version of such page is submitted separately as **Confidential Exhibit B-5**. **Exhibit C** includes the justification for confidential classification of the information highlighted in the Confidential Exhibits attached hereto.

11. On lines 20 through 22 of his Rebuttal Testimony, Mr. Hamiter identifies Sprint CLEC-specific network configuration information that would reveal to competitors on a state-wide basis not only where Sprint CLEC services are likely to exist, but where they are likely to be more concentrated. This information, which is not available to the public, is proprietary confidential business information and a trade secret within the meaning of §364.183(a) and (e), Florida Statutes, and proprietary carrier network information pursuant to 47 U.S.C. § 222(b) which Sprint is obligated to protect. The information is intended to be, and has been, treated by Sprint as confidential, and its disclosure would impair Sprint's competitive business interests. This information is commercially valuable, in that it would reveal to competitors the type and

volume of certain traffic delivered to and transiting Sprint's network, thus affording Sprint's competitors an artificial advantage in their ability to compete with Sprint and disadvantaging Sprint and its shareholders.

12. Upon a finding that the information highlighted in Exhibits B-1 through B-5 is proprietary confidential business information, such information should not be declassified for a period of at least eighteen months pursuant to §364.183, Florida Statutes, and should be returned to Sprint as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE Sprint respectfully requests that the Commission grant this Request for Confidential Classification.

Respectfully submitted this 27th day of October, 2010.



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Attorneys for Sprint

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served on the following by electronic and First Class Mail this 27th day of October, 2010:

Florida Public Service Commission:
Charles Murphy, Esq.
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Email: cmurphy@psc.state.fl.us

AT&T Florida:
E. Edenfield/T. Hatch/M. Gurdian
c/o Mr. Gregory Follensbee
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1561
Email: greg.follensbee@att.com

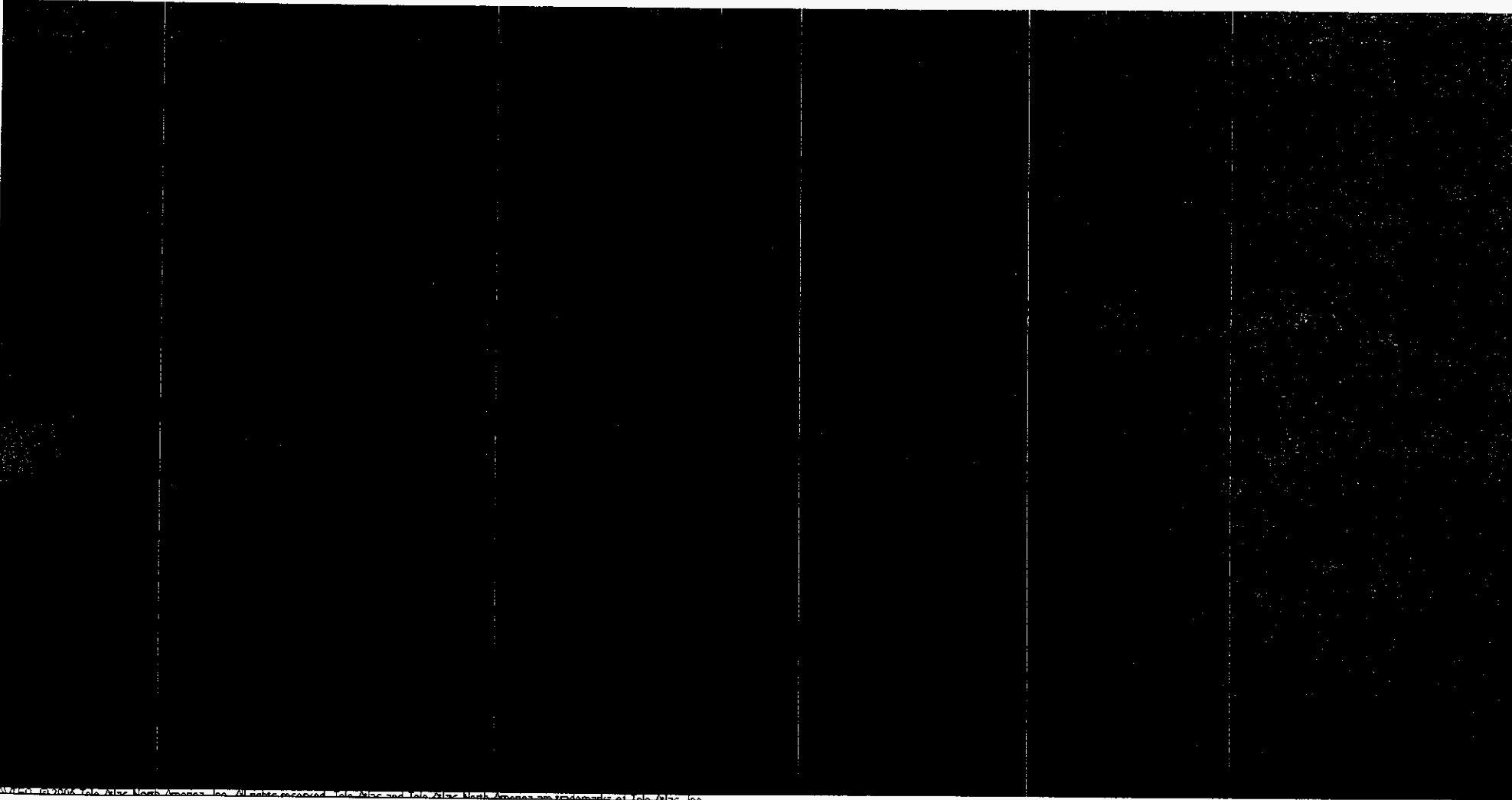
Florida Public Service Commission:
Brenda Merritt
Room 270G
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Email: bmerritt@psc.state.fl.us

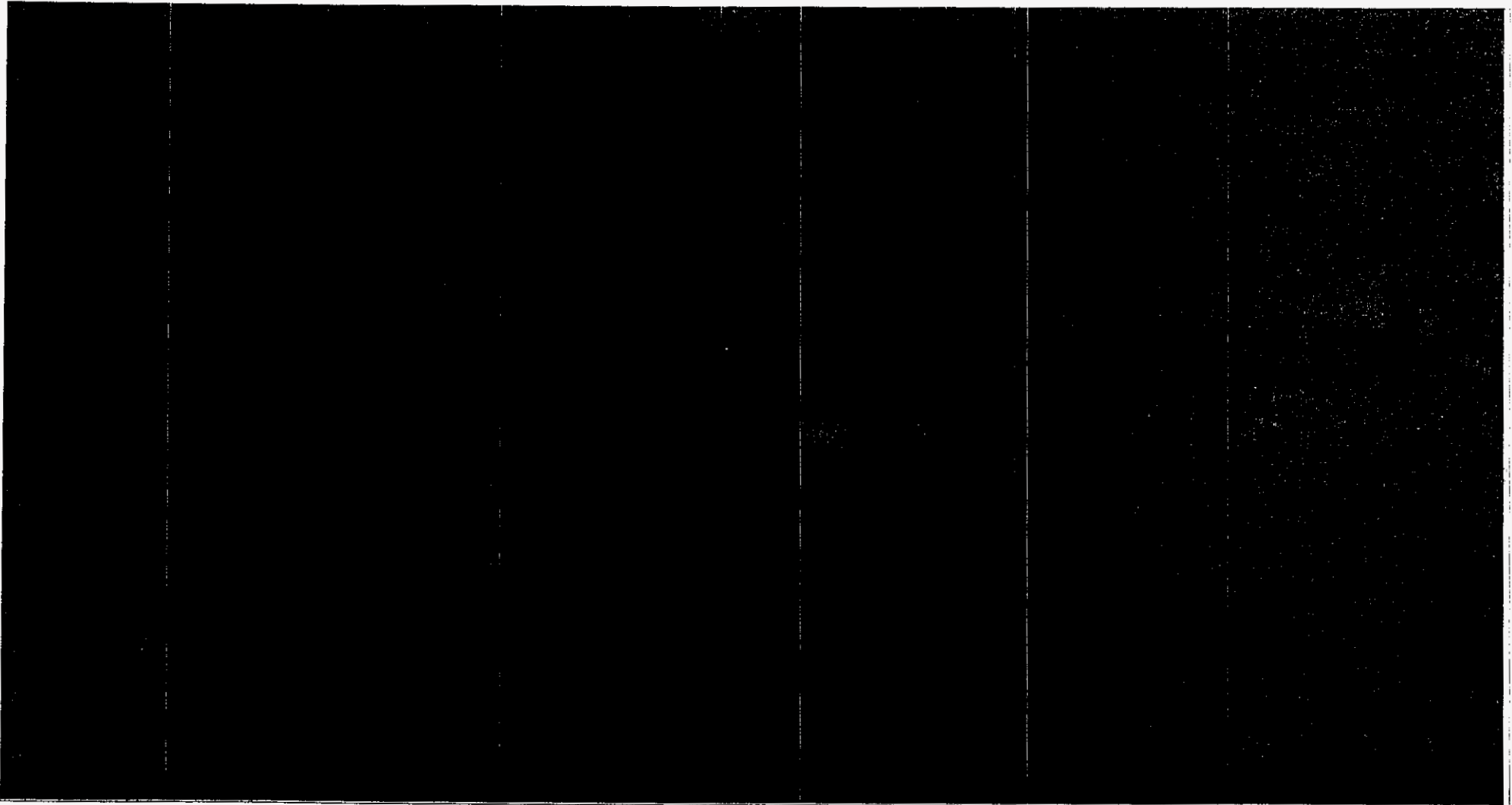
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Email: fttrueblo@psc.state.fl.us

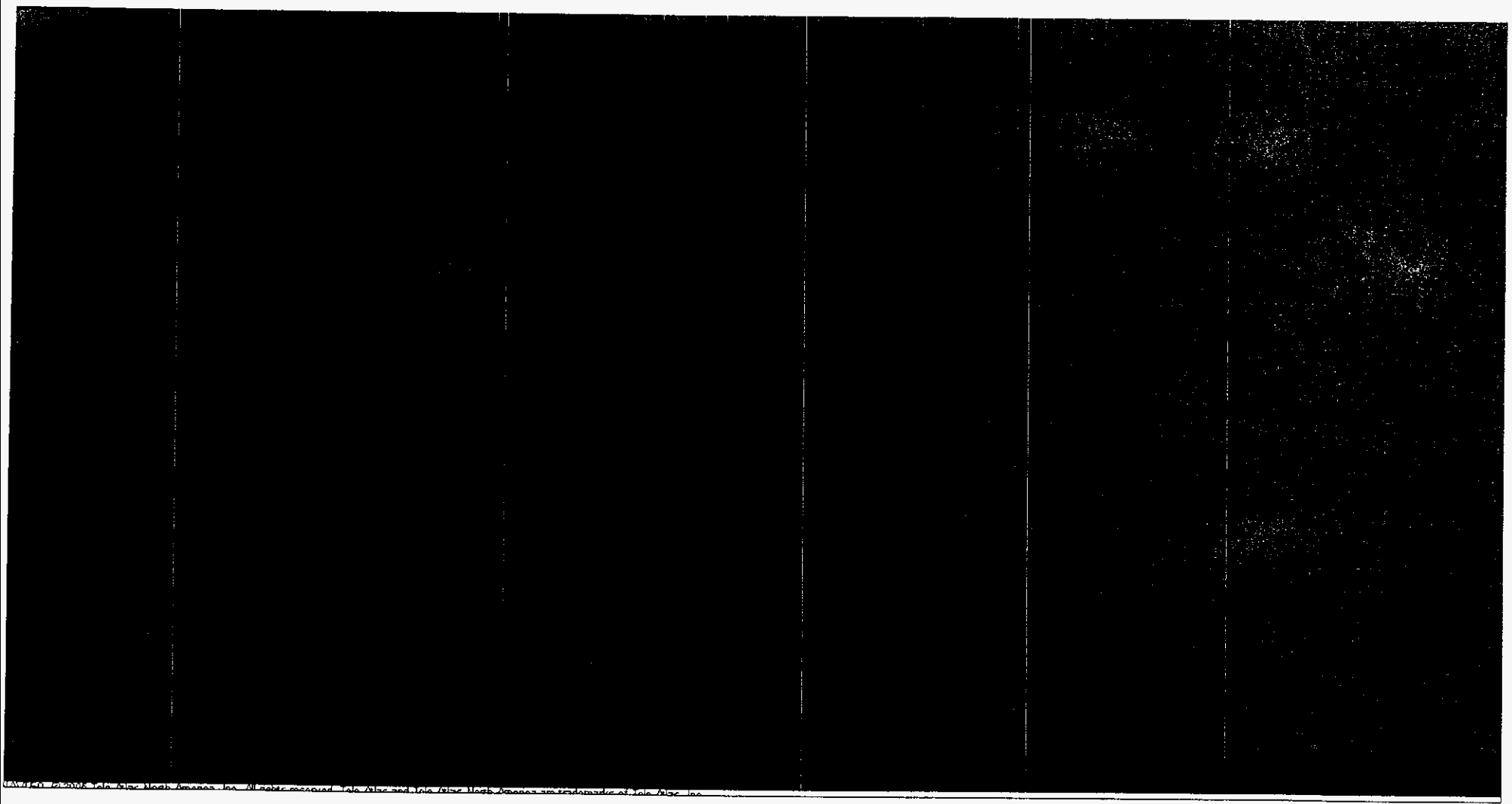


Marsha E. Rule

Exhibit A-1







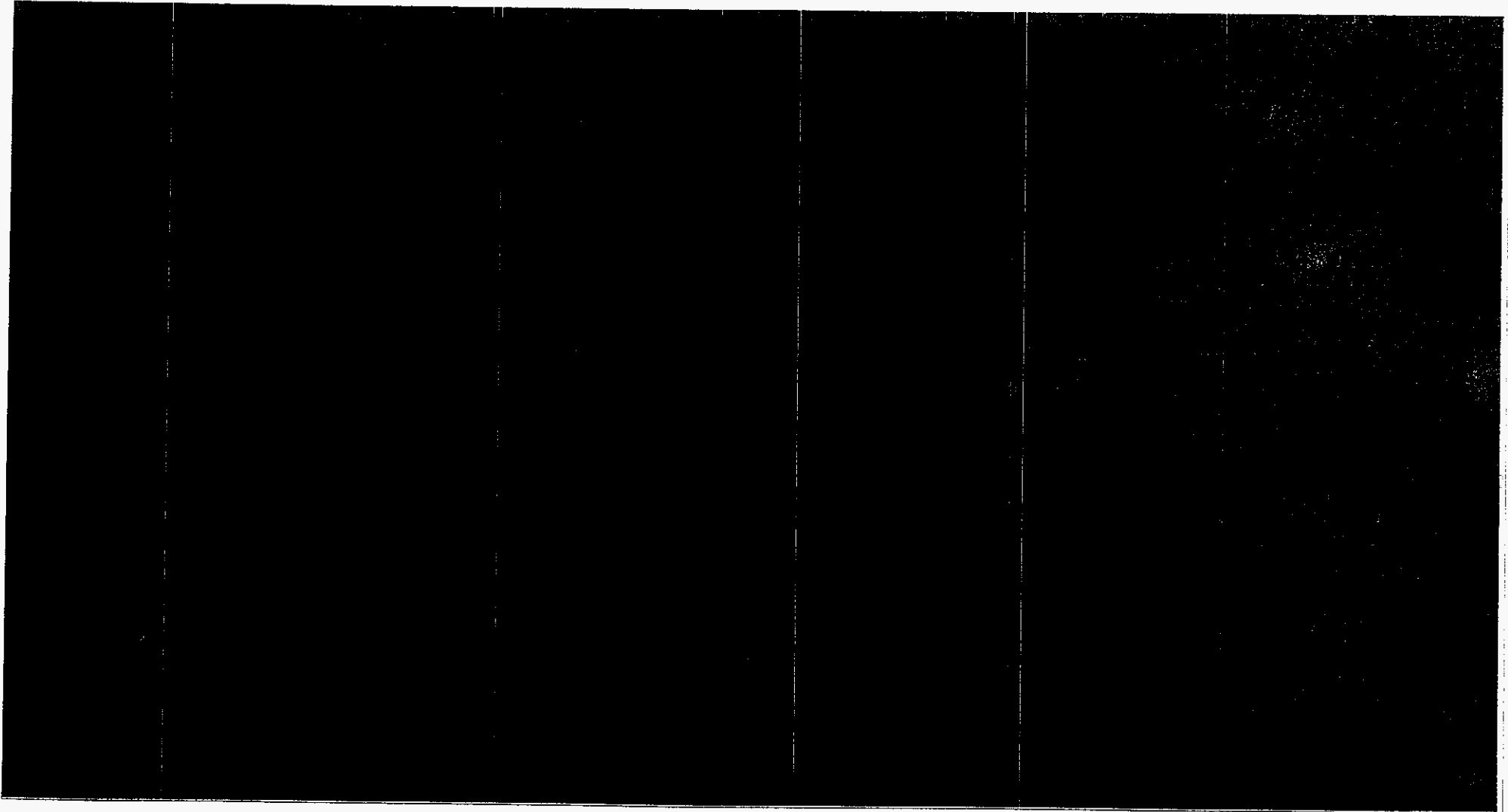


Exhibit A-2

Redacted Version

RESULTS OF SPRINT'S TRAFFIC STUDIES FOR FLORIDA SPRINT-ORIGINATED MOBILE-TO-LAND INTERMTA FACTORS

Date	InterMTA Factor Mobile-to-Land	
	CDMA (1)	iDEN (2)
05/31/09 - 06/06/09		
01/17/10 - 01/23/10		

(1) Sprint network
(2) Nextel network

Redacted Version

RESULTS OF SPRINT'S TRAFFIC STUDIES FOR FLORIDA SPRINT-ORIGINATED MOBILE-TO-LAND INTERMTA FACTORS

Date	InterMTA Factor Mobile-to-Land	
	CDMA (1)	iDEN (2)
05/31/09 - 06/06/09		
01/17/10 - 01/23/10		

(1) Sprint network
(2) Nextel network

Exhibit A-3

CONFIDENTIAL EXHIBIT RGF- 5				
AT&T ILEC-Transited New Cingular-Originated Traffic Over Interconnection Facilities To Sprint PCS in Florida and Tennessee, Despite Sprint PCS 1-way Connections in Florida and Tennessee to New Cingular 7-Day Study (5/31/2009 - 6/6/2009)				
	FLORIDA		TENNESSEE	
	Minutes of Use ("MOUs") Delivered by AT&T ILEC to Sprint PCS Over Interconnection Facilities	New Cingular-Originated MOUs Transited by AT&T ILEC to Sprint PCS Over Interconnection Facilities	MOUs Delivered by AT&T ILEC to Sprint PCS Over Interconnection Facilities	New Cingular-Originated MOUs Transited by AT&T ILEC to Sprint PCS Over Interconnection Facilities
5/31/2009				
6/1/2009				
6/2/2009				
6/3/2009				
6/4/2009				
6/5/2009				
6/6/2009				
Totals				

CONFIDENTIAL EXHIBIT RGF- 5				
AT&T ILEC-Transited New Cingular-Originated Traffic Over Interconnection Facilities To Sprint PCS in Florida and Tennessee, Despite Sprint PCS 1-way Connections in Florida and Tennessee to New Cingular 7-Day Study (5/31/2009 - 6/6/2009)				
	FLORIDA		TENNESSEE	
	Minutes of Use ("MOUs") Delivered by AT&T ILEC to Sprint PCS Over Interconnection Facilities	New Cingular-Originated MOUs Transited by AT&T ILEC to Sprint PCS Over Interconnection Facilities	MOUs Delivered by AT&T ILEC to Sprint PCS Over Interconnection Facilities	New Cingular-Originated MOUs Transited by AT&T ILEC to Sprint PCS Over Interconnection Facilities
5/31/2009				
6/1/2009				
6/2/2009				
6/3/2009				
6/4/2009				
6/5/2009				
6/6/2009				
Totals				

Exhibit A-4

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

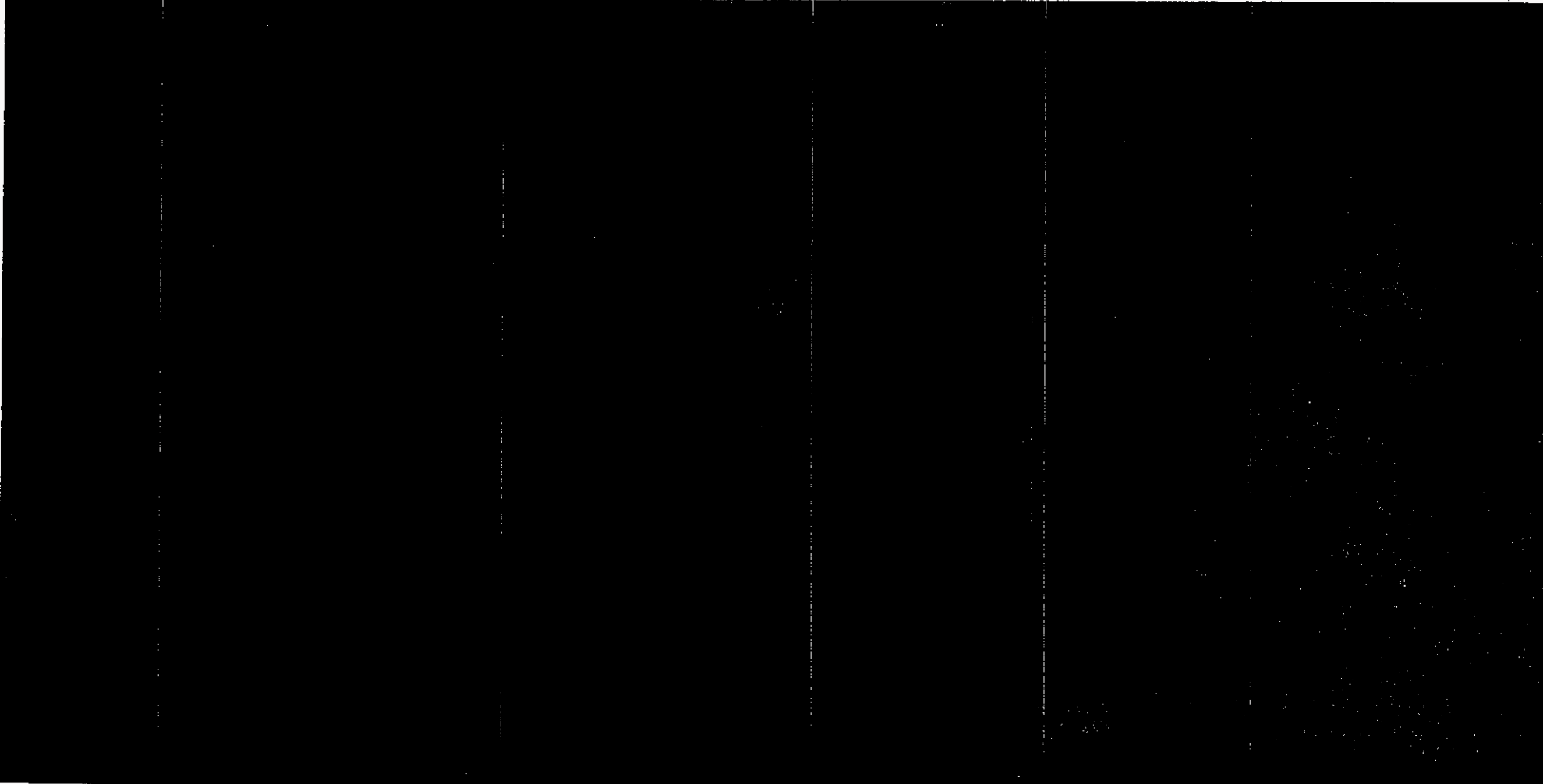
APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Configuration Item	Actual Start Date	Actual Finish Date	Service Call	Caller	Caller Organization	Created Date/Time	Close Date/Time	Status	Priority	Information	Subject	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
[REDACTED]																			

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Configuration Item	Actual Start Date	Actual Finish Date	Service Call	Caller	Caller Organization	Group Description	Class	Status	Priority	Reference	Solution	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
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SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

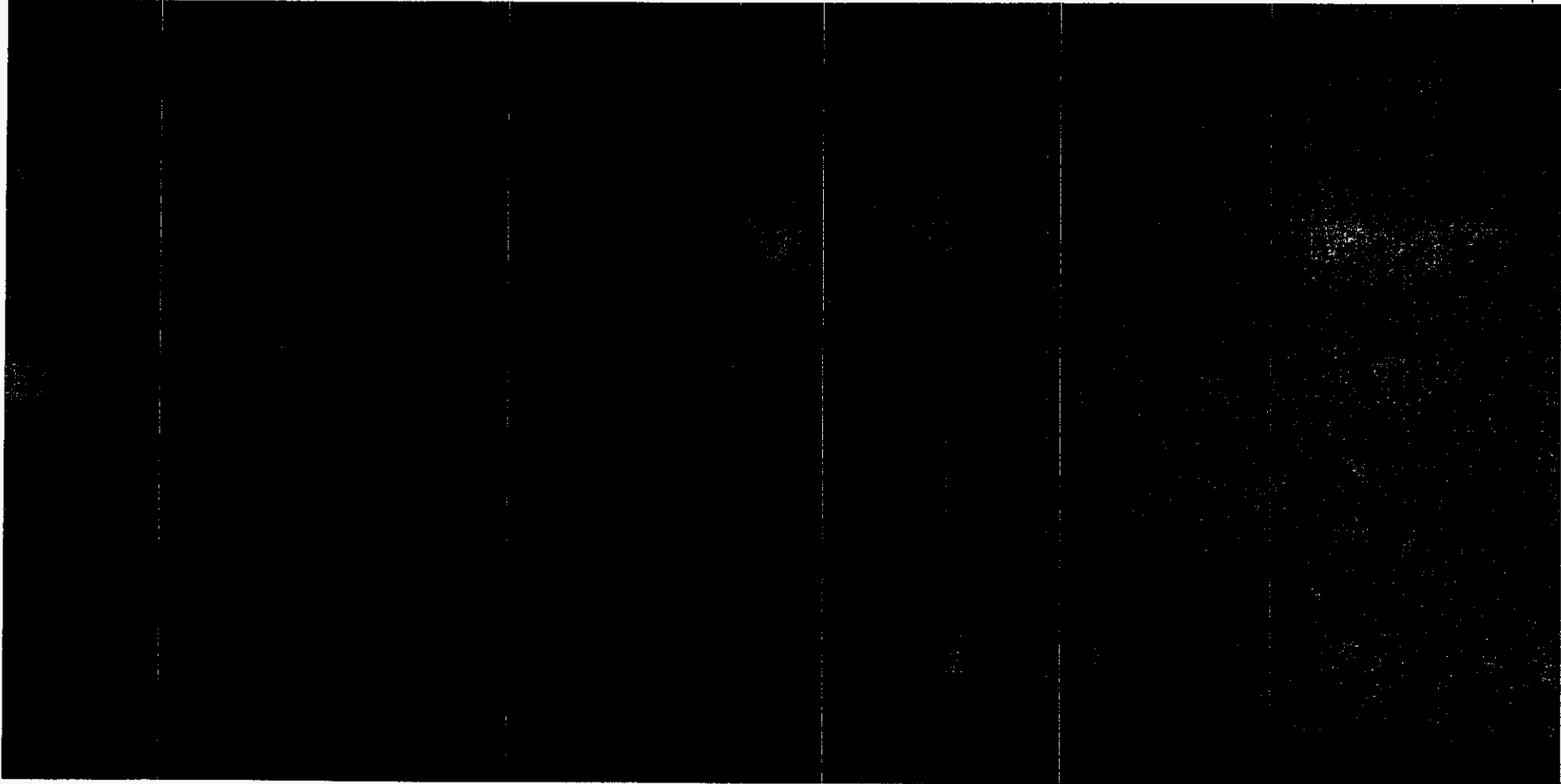
APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Disposition	Actual Start Date	Actual End Date	Service Call	Caller	Caller Organization	Created Date/Time	Case Number	Status	Priority	Latency	Subcase	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
[REDACTED]																			

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Classification Item	Actual Start Date	Actual Finish Date	Service Call	Caller	Caller Organization	Created Institution	Case Identifier	Hours	Priority	Submitter	Solver	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
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SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Case/Service Item	Actual Start Date	Actual Finish Date	Service Code	Case	Caller Organization	Case/Service Description	Case/Service Description	Date	Priority	Information	Status	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics # Tickets	Duration (Hours)
[REDACTED]																		

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Case/Video Name	Actual Start Date	Actual End Date	Service Call	Caller	Caller Organization	Created Date/Time	Clear Date/Time	Status	Priority	Interoffice	Subject	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
[REDACTED]																			

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Case/Request Line	Actual Start Date	Actual Finish Date	Service Call	Color	Color Organization	Created Date/Time	Case Disposition	State	Priority	Information	Subject	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
[REDACTED]																			

SPRINT'S CONFIDENTIAL RESPONSE TO
AT&T GEORGIA'S DISCOVERY REQUEST NO. 3
DOCKET NUMBERS 31691-U AND 31692-U

APP-B7S, APP-LIP, APP-XVP, APP-KBP Tickets LFM

Configuration Item	Actual Start Date	Actual Finish Date	Service Call	Caller	Caller Organization	Channel Description	Class	Status	Priority	Information	Sales	Closure Code	Assign To Workgroup	Assign To Person	Solve Workgroup	Resolved By	Metrics	# Tickets	Duration (Hours)
--------------------	-------------------	--------------------	--------------	--------	---------------------	---------------------	-------	--------	----------	-------------	-------	--------------	---------------------	------------------	-----------------	-------------	---------	-----------	------------------

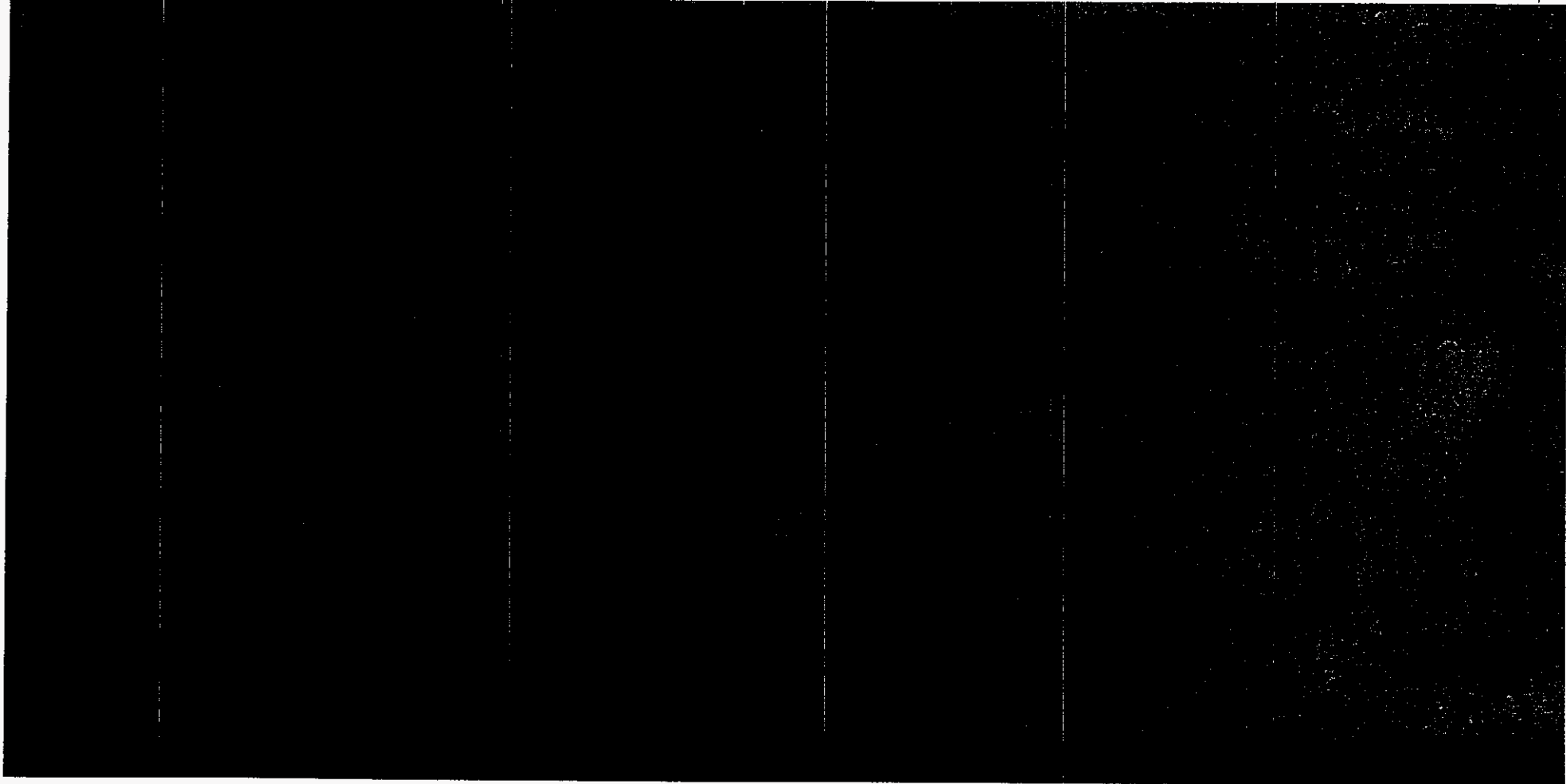


Exhibit A-5

1 circumstances where the Public Safety Answering Point (“PSAP”) needs to
2 isolate a call back to that carrier. Every reasonable effort should be made to avoid
3 blocked or mishandled E911 calls and the risks I have described can and should
4 be avoided. Sprint’s proposed language is insufficient to avoid these risks and
5 should be rejected in its present state. AT&T has proposed new language to
6 Sprint in an attempt to cure the defects in that language and is awaiting a
7 response. If Sprint accepts AT&T’s new language, this issue will be resolved.

8 **ISSUE # 27 [DPL ISSUE II.D(1)]**

9 **Should Sprint be obligated to establish additional Points of Interconnection**
10 **(POIs) when its traffic to an AT&T tandem serving area exceeds 24 DS1s for**
11 **three consecutive months?**

12 Contract Reference: Att. 3, AT&T section 2.3.2 (CMRS); AT&T section 2.6.1
13 (CLEC); Sprint section 2.3 (CLEC)

14 **Q. SPRINT DESCRIBES AT&T’S 24 DS1 THRESHOLD AS “ARTIFICIAL”**
15 **(FELTON DIRECT AT 18). IS IT?**

16 A. No. Having a specific threshold is a fair way to create a distributed network
17 architecture based on traffic volumes, and Sprint’s argument that the 24 DS1
18 threshold proposed by AT&T is artificial is not supported. Both Sprint CLEC and
19 Sprint CMRS currently have multiple POIs in LATAs in Florida. *** BEGIN

20 **CONFIDENTIAL/PROPRIETARY *****

21

22 ***** END**

23 **CONFIDENTIAL/PROPRIETARY ***** Exactly what Sprint means by
24 “artificial” is unclear and it is possible that Sprint still does not understand exactly
25 what AT&T is proposing with its 24 DS1 threshold language. Using Figure 1,

1 circumstances where the Public Safety Answering Point (“PSAP”) needs to
2 isolate a call back to that carrier. Every reasonable effort should be made to avoid
3 blocked or mishandled E911 calls and the risks I have described can and should
4 be avoided. Sprint’s proposed language is insufficient to avoid these risks and
5 should be rejected in its present state. AT&T has proposed new language to
6 Sprint in an attempt to cure the defects in that language and is awaiting a
7 response. If Sprint accepts AT&T’s new language, this issue will be resolved.

8 **ISSUE # 27 [DPL ISSUE II.D(1)]**

9 **Should Sprint be obligated to establish additional Points of Interconnection**
10 **(POIs) when its traffic to an AT&T tandem serving area exceeds 24 DS1s for**
11 **three consecutive months?**

12 Contract Reference: Att. 3, AT&T section 2.3.2 (CMRS); AT&T section 2.6.1
13 (CLEC); Sprint section 2.3 (CLEC)

14 **Q. SPRINT DESCRIBES AT&T’S 24 DS1 THRESHOLD AS “ARTIFICIAL”**
15 **(FELTON DIRECT AT 18). IS IT?**

16 **A.** No. Having a specific threshold is a fair way to create a distributed network
17 architecture based on traffic volumes, and Sprint’s argument that the 24 DS1
18 threshold proposed by AT&T is artificial is not supported. Both Sprint CLEC and
19 Sprint CMRS currently have multiple POIs in LATAs in Florida. *** **BEGIN**

20 **CONFIDENTIAL/PROPRIETARY *****

21

22 ***** END**

23 **CONFIDENTIAL/PROPRIETARY ***** Exactly what Sprint means by
24 “artificial” is unclear and it is possible that Sprint still does not understand exactly
25 what AT&T is proposing with its 24 DS1 threshold language. Using Figure 1,

CONFIDENTIAL
EXHIBITS B1 THROUGH B-5
[FILED UNDER CONFIDENTIAL COVER]

Exhibit C

EXHIBIT C
TO SPRINT'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL INFORMATION	LOCATION	REASON
Exhibit RGF-2	Entire document (both paper and CD)	As explained in Sprint's Request, this information is should remain confidential for national security reasons, and further, is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Sprint. See §364.183(a) and (e), Fla. Stat.
Exhibit RGF-3	Highlighted portion	As explained in Sprint's Request, this information is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Sprint. See §364.183(a) and (e), Fla. Stat.
Exhibit RGF-5	Highlighted portion	As explained in Sprint's Request, this information is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Sprint. See §364.183(a) and (e), Fla. Stat. and 47 U.S.C. § 222(b).
Attachment GA DR-3	Entire Document	As explained in Sprint's Request, this information is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Sprint. See §364.183(a) and (e), Fla. Stat. and 47 U.S.C. § 222(b).
Hamiter Rebuttal Testimony	Highlighted portion on page 4, lines 20-22	As explained in Sprint's Request, this information is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Sprint. See §364.183(a) and (e), Fla. Stat.