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October 11, 2000

ORIGINAL

RECEIVED-FPSC
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RECORDS AND REPORTING

NOTICE: CONFIDENTIAL DOCUMENT ATTACHED

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

Re: Docket No. 000761-TP

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Sprint PCS' Request for Confidential Classification and an unedited version of documents referred to in Attachment A to Sprint PCS' Request for Confidential Classification. The portions of these documents that are confidential have been highlighted in accordance with the Commission's rule on confidential documents. Please keep these documents confidential pending a decision on the Company's Request for Confidential Classification and, thereafter, if the Company's Request is granted. Also enclosed are two copies of the redacted versions of the documents for which confidential classification is being requested.

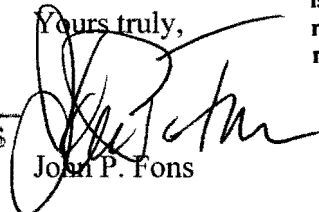
Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

(x-ref. 12053-00)

Thank you for your assistance in this matter.

This confidentiality request was filed by or for a "telco" for DN 12945-00. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

Yours truly,



John P. Fons

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

Enclosures *REQ*
cc: *176* copies of record (*176* docs.)

Conf. 3-Parts
DOCUMENT NUMBER-DATE

Redacted
DOCUMENT NUMBER-DATE

12944 OCT 11 8

12945 OCT 11 8

12946 OCT 11 8

FPSC-RECORDS/REPORTING

FPSC-RECORDS/REPORTING

FPSC-RECORDS/REPORTING

In Re: Petition by Sprint PCS for Arbitration)
of Certain Terms and Conditions of a Proposed)
Agreement with BellSouth Pursuant to)
Section 252 of the Communications Act)
_____)

Docket No. 000761-TP
Filed: October 11, 2000

SPRINT PCS' REQUEST FOR CONFIDENTIAL CLASSIFICATION

Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint PCS"), pursuant to Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. On September 11, 2000, Sprint PCS responded to BellSouth Telecommunications, Inc.'s (BellSouth's) First Set of Interrogatories and First Request for Production to Sprint PCS, filed on August 18, 2000.

2. Pursuant to the Procedural Order, Order No. PSC-00-1563-PCO-TP, entered in this proceeding, parties are required to serve discovery responses on Staff.

3. Sprint PSC, in response to the Procedural Order, has served on the Director of the Division of Records and Reporting a copy of its Responses to BellSouth's First Set of Interrogatories and its Response and Supplemental Response to BellSouth's First Request for Production of Documents. Sprint PCS hereby files this Request for Confidential Classification because information contained in its responses contain proprietary confidential business information. The specific responses and documents and the reason for why confidential treatment is required is set forth in Attachment A.

WHEREFORE, based on the foregoing, Sprint PCS respectfully requests that the Commission enter an order declaring the information described above to be confidential proprietary business information that is not subject to public disclosure.

DOCUMENT NUMBER-DATE

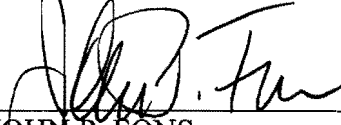
12944 OCT 11 8

FPSC-RECORDS/REPORTING

Respectfully submitted this 11th day of October, 2000.

CHARLES J. REHWINKEL
Sprint-Florida, Inc.
P. O. Box 2214
Tallahassee, Florida 32316
(850) 847-0244

and



JOHN P. FONS
Augsley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR SPRINT

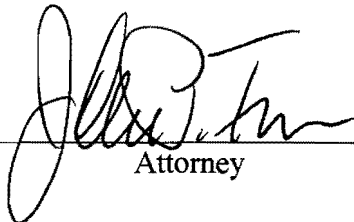
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail, overnight delivery(**) or hand delivery(*) this 11th day of October, 2000, to the following:

Nancy White, Esq. *
Michael Goggin, Esq.
c/o Nancy Sims
BellSouth Telecommunications, Inc.
150 S. Monroe St., Suite 400
Tallahassee, FL 32301

Diana Caldwell, Esq. *
Felicia Banks, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Lisa S. Foshee, Esq. **
BellSouth Telecommunications, Inc.
675 W. Peachtree St., Suite 4300
Atlanta, GA 30375



Attorney

Responses to Production Requests

<u>Document</u>	<u>Pages</u>	<u>Reasons for Confidentiality</u>
2A4	All	This document contains financial information about Sprint PCS. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. The public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, including determining which markets to enter, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2C1(a)	All	This document contains financial information about Sprint-Florida which is used for pricing of its services. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint-Florida's competitors in developing their own business strategies, including pricing their service, thereby giving them an advantage and harming Sprint-Florida's ability to compete. Pursuant to Section 364.813, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2D1	All	(5 pgs) This document contains Sprint PCS' network demand information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. The public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, including determining which markets to enter, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
	All	(132 pgs) This document contains Sprint PCS' network demand and cost information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. The public disclosure of this information, which was developed at an expense to Sprint PCS, would greatly assist Sprint PCS' competitors in developing their own business strategies, including determining which markets to enter, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

<u>Document</u>	<u>Pages</u>	<u>Reasons for Confidentiality</u>
17	All	(6 pgs) This document contains Sprint PCS' subscribers and subscriber usage information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. The public disclosure of this information, which was developed at an expense to Sprint PCS, would greatly assist Sprint PCS' competitors in developing their own business strategies, including determining which markets to enter, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2B3	All	This document contains wholesale prices and volume discounts that Sprint PCS uses to contract with Sprint Long Distance for the provision of long distance services. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would aid the competitors of both Sprint PCS and Sprint Long Distance in pricing their services and would harm Sprint PCS and Sprint Long Distance's ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2B5	All	(2 pgs) This document contains vendor-specific pricing information and confidential business information which is confidential to both Sprint PCS and Nortel. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would impair Sprint PCS' ability to contract for goods and for services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
	All	(1 pg) This document contains vendor-specific and Sprint PCS-specific network architecture information which is confidential to both Sprint PCS and Nortel. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would both harm Sprint PCS' ability to contract for goods and/or services on favorable terms, and would provide Sprint PCS' competitors with information that would enhance their ability to compete at Sprint PCS' expense. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

<u>Document</u>	<u>Pages</u>	<u>Reasons for Confidentiality</u>
	All	(154 pgs) This document contains vendor-specific pricing information and confidential business information which is confidential to both Sprint PCS and Nortel. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would impair Sprint PCS' ability to contract for goods and for services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2B6	All	This document contains vendor-specific pricing information and confidential business information which is confidential to both Sprint PCS and Nortel. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would impair Sprint PCS' ability to contract for goods and for services on favorable terms. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
2B7	All	This document contains prices for spectrum licenses. This information was developed at an expense to Sprint PCS. The public disclosure of such information would give Sprint PCS' competitors free access to such information and give them an advantage in bidding for such licenses and would harm Sprint PCS' ability to bid for or purchase additional spectrum licenses and would harm Sprint PCS' ability to compete in current and other market areas. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

Interrogatory Responses

<u>Interrogatory</u>	<u>Pages</u>	<u>Reasons for Confidentiality</u>
3A	All	The attached document contains information concerning Sprint PCS' equipment and equipment locations necessary for serving its customers. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in selecting markets to enter and how to compete with Sprint PCS, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
17	All	The attached document contains Sprint PCS-specific investment information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
29	All	The attached document contains Sprint PCS-specific cost information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
36	All	The attached document contains Sprint PCS-specific customer usage information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, including selecting markets to enter and determining competitive prices, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

<u>Interrogatory</u>	<u>Pages</u>	<u>Reasons for Confidentiality</u>
37	All	This interrogatory response and attached document contains Sprint PCS-specific customer usage information. Public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, including selecting markets to enter and determining competitive prices, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
42	All	This interrogatory response contains network design criteria. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
47	All	The attached document (map) contains Sprint PCS-specific data concerning which markets Sprint PCS is serving. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information will greatly assist Sprint PCS' competitors in developing, at no cost to them, their own business strategies, including the markets they should enter, thereby giving them an advantage and harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
54	All	This interrogatory response contains network design criteria. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

Interrogatory Pages Reasons for Confidentiality

- 66 All This interrogatory response contains network design criteria. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
- 74 All This interrogatory response contains Sprint PCS-specific network usage information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
- 75 All The attached document contains Sprint PCS-specific customer usage information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in developing their own business strategies, including selecting markets to enter and determining competitive prices, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.
- 79 All The attached document (53 pgs) contains Sprint PCS-specific network architecture and design information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

Interrogatory Pages Reasons for Confidentiality

All The attached document (24 pgs) contains Sprint PCS-specific network architecture and design information. This information is valuable, it is used by Sprint PCS in conducting its business, and Sprint PCS strives to keep it confidential. Public disclosure of this information would greatly assist Sprint PCS' competitors in designing their networks, at no cost to them, thereby giving them an advantage while harming Sprint PCS' ability to compete. Pursuant to Section 364.183, Florida Statutes, such information is classified as proprietary confidential information, which is exempt from Chapter 119, Florida Statutes.

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