## **ORIGINAL**



**Susan S. Masterton** Attorney

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April 3, 2003

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

RE: Docket Nos. 981834 & 990321-TP

56005 Note 12

Dear Ms. Bayo':

Enclosed for filing are the original and 15 copies of the Sprint's Notice of Intent to Request Confidential Classification. Copies are being served on the parties in this docket, pursuant to the attached Certificate of Service.

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

Sincerely,

Susan S. Masterton

**Enclosures** 

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

CTR \_\_\_\_\_ ECR \_\_\_\_ GCL \_\_\_\_ OPC \_\_\_\_ MMS \_\_\_\_ SEC \_\_\_\_ OTH \_\_\_

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DOCUMENT NUMBER-DATE

03151 APR-38

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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served Electronically, U.S. Mail, and \*Hand Delivery this 3nd day of April, 2003 to the following:

Wayne Knight, Esq. \*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0870

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

Alltel Communications Services, Inc. Bettye Willis
One Allied Drive
Little Rock, AR 72203-2177

Pennington Law Firm Karen Camechis Post Office Box 1009 Tallahassee, Florida 32302

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

Time Warner Telecom Carolyn Marek 233 Bramerton Court Franklin, TN 37069

FCCA c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden Street Tallahassee, Florida 32301 Ausley Law Firm
Jeff Wahlen
Post Office Box 391
Tallahassee, Florida 32302

MCI WorldCom Communications, Inc. Donna McNulty 1203 Governors Square Blvd. Suite 201 Tallahassee, Florida 32301-2960

Messer Law Firm Floyd Self/Tracy Hatch Post Office Box 1876 Tallahassee, Florida 32302

MediaOne Florida Telecommunications, Inc. c/o Laura L. Gallagher, P.A. 101 E. College Ave., Suite 302 Tallahassee, Florida 32301

AT&T Communications of the Southern States, Inc. Virginia C. Tate 1200 Peachtree Street, NE Suite 8066 Atlanta, GA 30309

Katz, Kutter Law Firm Charles Pellegrini/Patrick Wiggins 12<sup>th</sup> Floor 106 East College Avenue Tallahassee, Florida 32301 Supra Telecommunications & Information Systems, Inc. Mark E. Buechele 2620 S.W. 27<sup>th</sup> Avenue Miami, FL 33133

Verizon-Florida, Incorporated Michelle Robinson P.O. Box 110, FLTC0007 Tampa, FL 33601-0110

ITC^DeltaCom Communications, Inc. Nanette Edwards Messer, Caparello & Self Post Office Box 1876 Tallahassee, Florida 32302-1876

Network Telephone Corporation Brent E. McMahan 815 South Palafox Street Pensacola, FL 32501-5937

KMC Telecom, Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30043-8119

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

Verizon-Florida, Incorporated Richard Chapkis c/o David Chirstian 106 East College Avenue, Suite 810 Tallahassee, Florida 32301-7704

Covad Communications Company William H. Weber 1230 Peachtree Street, NE 19<sup>th</sup> Floor Atlanta, GA 30309-3574

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Susan S. Masterton

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 981834-TP

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

**DOCKET NO. 990321-TP** 

Filed: April 3, 2003

## SPRINT-FLORIDA, INCORPORATED'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Sprint-Florida, Incorporated ("Sprint") pursuant to Rule 25-22.006, Florida Administrative Code, files this Notice of Intent to Request Confidential Classification and says:

- 1. On March 13, 2003, Staff served its Third Request for Production of Documents on Sprint. Sprint is providing its responses to this production request on this date.
- The information contained in the CDs provided in Sprint's Responses to Staff's Third Request for Production of Documents No. 15, includes confidential information that is proprietary to Sprint.
- 3. In order to allow the Commission staff to take possession of this confidential information without delay, Sprint is now filing this Intent to Request Confidential Classification, pursuant to Rule 25-22.006(3)(a).

03151 APR-38

FPSC-COMMISSION CLERK

4. The original of this notice has been filed with the Division of Records and Reporting, and a copy has been served on all parties of record.

RESPECTFULLY SUBMITTED this 3rd day of April 2003.

Susan S. Masterton

P.O. Box 2214

Tallahassee, FL 32316-2214

(850) 599-1560 (phone)

(850) 878-0777 (fax)

susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO SPRINT-FLORIDA, INCORPORATED (NOS. 10 - 21)
DOCKETS NOS. 981834-TP, 990321-TP
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- 5. If your response to Interrogatory 12(g) is affirmative, provide the documentation where this caution was provided.
- 6. Provide any analysis or studies that address the statistical validity of the recommendations discussed in Interrogatory 12(h).
- 7. Provide any study results that were used to validate the reasonableness of the subject matter expert opinions.

- 13. Cross-reference Interrogatory No. 13. Provide any analysis or studies that address the statistical validity of the sample size and any inferences made on the population based on this study.
- 14. Reference CONFIDENTIAL Exhibit JRD-2, page 8 of 107. "To support the worktimes of the Regional Transmission Engineers, a sample of recent work activities for new collocations was studied." To the extent that this information has not been provided in response to POD No. 10(a), provide this study and any documentation or analysis used to develop this study.
  - Provide any analysis or studies that address the statistical validity of the sample size and any inferences made on the population based on this study.
- 15. Provide electronic copies of the architectural drawings for all Sprint COs in the state of

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Florida where collocation has occurred. To the extent possible provide these files on compact disc(s) as AutoCAD drawing files. (e.g. CLLIcode.dwg or Coname.dwg)

1. Cross-reference Interrogatory No. 18. To the extent that this material is not already included in your previous response, provide electronic copies of the floor plan drawings analyzed to determine the shared support and growth space factor.