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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

**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 1<sup>st</sup> day of August, 2005 to the following:

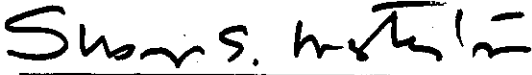
Division of Legal Services  
Lee Fordham/ Beth Keating  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
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Nancy Pruitt/Ann Marsh  
Florida Public Service Commission  
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Marva B. Johnson/Mike Duke  
1755 North Brown Road  
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Chip Yorkgitis / Barbara Miller  
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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

**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.	)	
<hr/>		

**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**

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.<sup>1</sup> 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.

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<sup>1</sup> 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 1<sup>st</sup> day of August, 2005.



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ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Highlighted portions Interrogatory Nos. 4, 7, 8, 13, and 16	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.
Attachment to Interrogatory No. 1 - KMC Complaint Summary (entire document)	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.
Highlighted portions of Attachment to Interrogatory No. 13 - KMC Call Diagram	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.
Attachment to POD No. 1 - KMC CDR Records (CD only)	Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP
Highlighted portions of Attachment to POD No. 6 - KMC Correlated call Records (CCR)	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>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 – 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 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 arbitrating 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:**

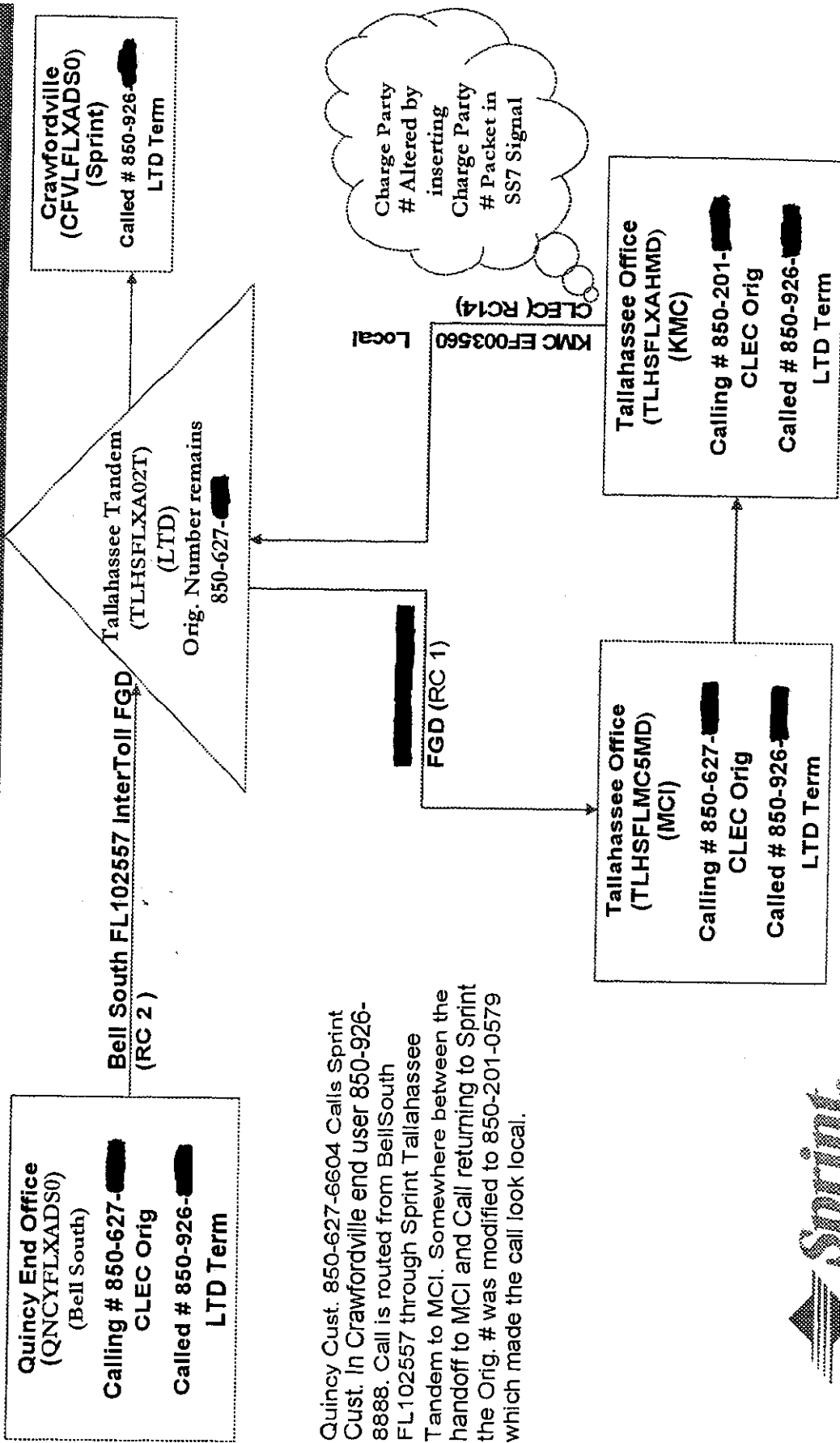
- (a) **What percentage of intrastate interexchange traffic in Florida that is carried by Sprint IXC originates on Sprint-FL's network?**
- (b) **What percentage of interstate interexchange traffic terminating in Florida (with any local exchange carrier) that is carried by Sprint IXC (i.e., for which 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

**\*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.



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

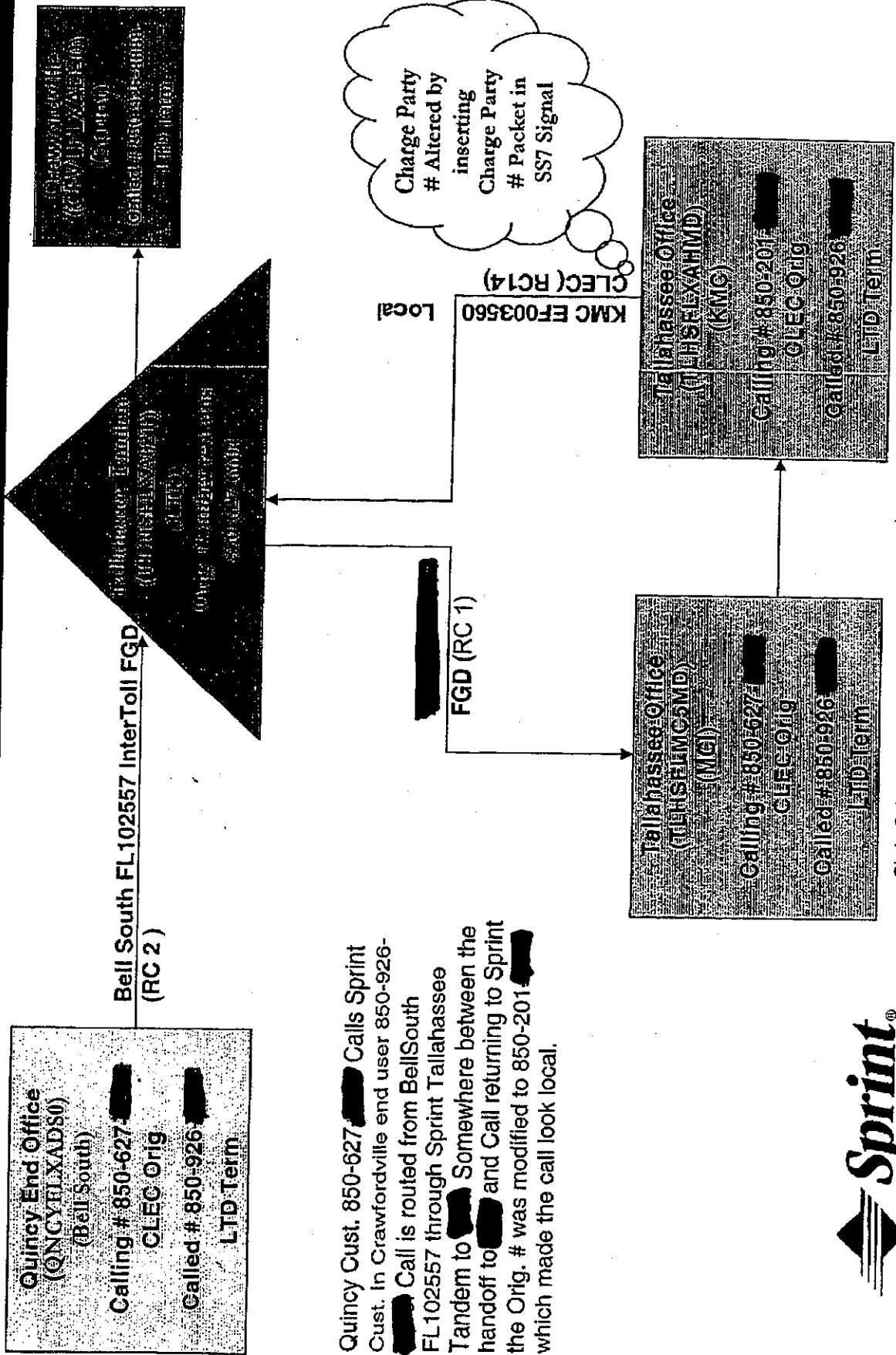
**\*CONFIDENTIAL\***

**KMC CDR Records**  
**\*On CD only\***





# KMC-Tracking Fraudulent Activity



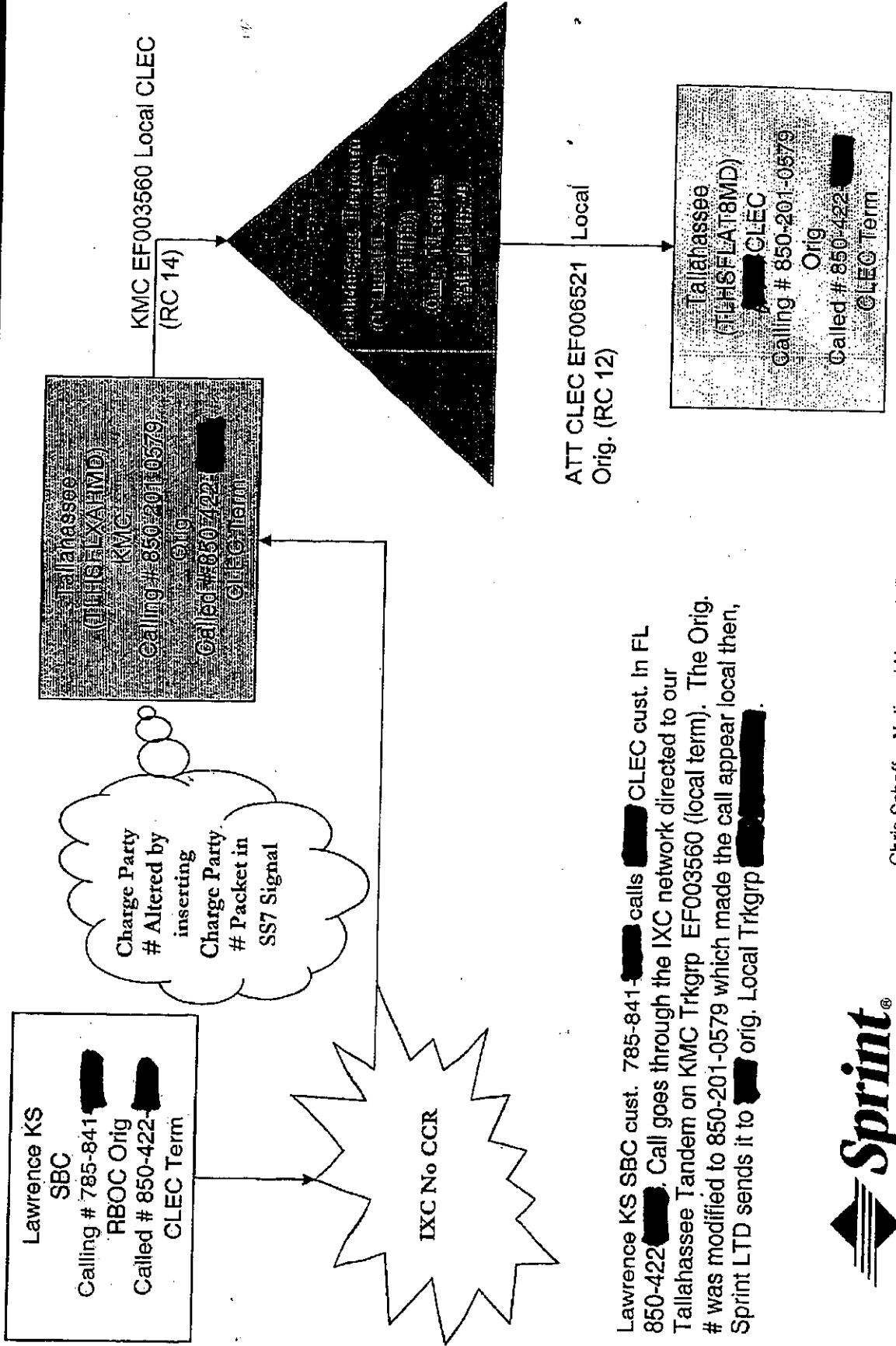
Quincy Cust. 850-627-██████████ Calls Sprint Cust. In Crawfordville end user 850-926-██████████ Call is routed from BellSouth FL102557 through Sprint Tallahassee Tandem to ██████████ Somewhere between the handoff to ██████████ and Call returning to Sprint the Orig. # was modified to 850-201-██████████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



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



# 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	Call Cat	Calling ST	Called ST	Transit	CPN	F	Charge #	Calling #	Called #	JIP (Jurisd) Direction	T S Code	T Cic	Date/Time	Duration
KMM	2S2L	NV	FL	T	F	F	850-201-0579	702-300	850-566	850205 T	EF003560	180	43:48.8	230.555
KMM	2S2L	IL	FL	F	F	F	850-201-0579	312-983	850-410	850205 T	EF003560	225	21:13.8	285.818
KMM	2S2L	IL	FL	T	F	F	850-201-0579	815-882	850-264	850205 T	EF003560	33	05:30.8	41.991
KMM	2S2L	KY	FL	T	F	F	850-201-0579	859-232	850-980	850205 T	EF003560	233	06:01.7	6.414
KMM	2S2L	NC	FL	F	F	F	850-201-0579	828-295	850-644	850205 T	EF003560	248	48:11.9	144.374
KMM	2S2L	MIN	FL	F	F	F	850-201-0579	952-646	850-245	850205 T	EF003560	3225	02:41.8	65.402
KMM	2S2L	NJ	FL	T	F	F	850-201-0579	973-208	850-566	850205 T	EF003560	278	17:43.8	91.99
KMM	2S2L	VA	FL	T	F	F	850-201-0579	571-221	850-566	850205 T	EF003560	3239	57:37.3	1268.223
KMM	2S2L	TX	FL	F	F	F	850-201-0579	214-340	850-921	850205 T	EF003560	3028	03:07.9	51.823
KMM	2S2L	GA	FL	T	F	F	850-201-0579	229-228	850-251	850205 T	EF003560	3152	18:44.7	4.158
KMM	2S2L	NJ	FL	T	F	F	850-201-0579	732-310	850-566	850205 T	EF003560	228	07:08.8	19.741
KMM	2S2L	MS	FL	T	F	F	850-201-0579	601-582	850-567	850205 T	EF003560	3089	47:59.4	3.218
KMM	2S2L	NC	FL	F	F	F	850-201-0579	336-545	850-566	850205 T	EF003560	118	46:58.6	187.217
KMM	2S2L	GA	FL	F	F	F	850-201-0579	229-227	850-552	850205 T	EF003560	1	02:19.6	1819.719
KMM	2S2L	CA	FL	T	F	F	850-201-0579	909-874	850-566	850205 T	EF003560	220	05:07.8	48.526
KMM	2S2L	NY	FL	T	F	F	850-201-0579	718-327	850-321	850205 T	EF003560	52	41:03.6	951.597
KMM	2S2L	NY	FL	T	F	F	850-201-0579	817-912	850-264	850205 T	EF003560	3276	40:42.2	845.911
KMM	2S2L	NC	FL	T	F	F	850-201-0579	828-446	850-566	850205 T	EF003560	116	38:50.9	43.753
KMM	2S2L	MI	FL	T	F	F	850-201-0579	313-492	850-566	850205 T	EF003560	3186	33:54.9	231.644
KMM	2S2L	GA	FL	F	F	F	850-201-0579	229-220	850-385	850205 T	EF003560	3086	08:28.3	997.472
KMM	2S2L	MI	FL	F	F	F	850-201-0579	248-557	850-575	850205 T	EF003560	241	17:52.5	67.576
KMM	2S2L	GA	FL	T	F	F	850-201-0579	404-312	850-566	850205 T	EF003560	3175	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



Chris Schaffer National Network Engineering

Sprint Restricted

11/11/03



# Appendix B

## KMC CLEC PLU Estimated Back Billing

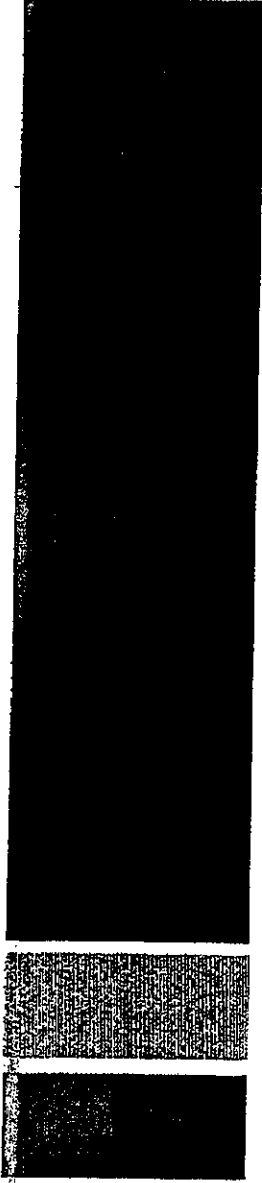
Sprint LTD - KMC Telecom  
 CLEC PLU Estimated Backbilling  
 For the period of July 2002 to August 2003

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	\$	\$	\$	\$	\$
<b>Total</b>	\$	\$	\$	\$	\$



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

Ppd by Sonia Diedel



## 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

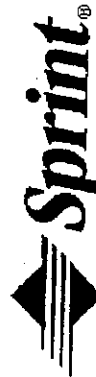


2/21/2005

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# KMC Summary

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



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# AT&T Summary

Carrier	Data from 4/1/9	Total (Duration in Seconds)	% of Calls	% of Usage
[REDACTED]	Total Number of Calls	3,237	97.5%	
[REDACTED]	Sum of Duration	647,072		97.0%
[REDACTED]	Total Number of Calls	67	2.0%	
[REDACTED]	Sum of Duration	17,754		2.7%
[REDACTED]	Total Number of Calls	11	0.3%	
[REDACTED]	Sum of Duration	1,390		0.2%
[REDACTED]	Total Number of Calls	3	0.1%	
[REDACTED]	Sum of Duration	418		0.1%
[REDACTED]	Total Number of Calls	1	0.0%	
[REDACTED]	Sum of Duration	111		0.0%
[REDACTED]	Total Number of Calls	1	0.0%	
[REDACTED]	Sum of Duration	28		0.0%
[REDACTED]	Total Number of Calls	1	0.0%	
[REDACTED]	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	
<b>239-689-2995 Total</b>		<b>162</b>	<b>33%</b>
850-201-0579	[REDACTED]	45	
	[REDACTED]	101	
	[REDACTED]	2	
	[REDACTED]	37	
	[REDACTED]	1	
	[REDACTED]	2	
	[REDACTED]	76	
	[REDACTED]	1	
	[REDACTED]	17	
<b>850-201-0579 Total</b>		<b>282</b>	<b>58%</b>

\* 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


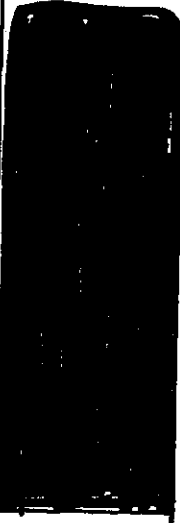
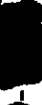
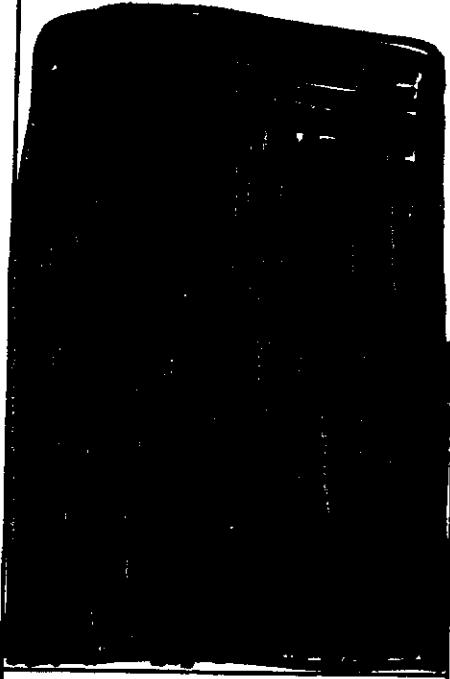



2/21/2005

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# Time Warner Charge Party Number usage

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

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



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**\*CONFIDENTIAL\***

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

**\*On CD only\***

**\*CONFIDENTIAL\***

**Sprint/Agilent Master Agreement**

**\*CONFIDENTIAL\***

**Agilent SOW for the KMC study**

**\*CONFIDENTIAL\***

**KMC Agilent CDR's \*on CD only\***

**\*CONFIDENTIAL\***

**CLEC Implementation Checklist and Account Profile**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaint of Sprint-Florida, Incorporated ) 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 ) Section 364.16(3)(a), Florida Statutes. )	)	Docket No. 041144-TP       Filed: August 1, 2005
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**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.<sup>1</sup>

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.

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<sup>1</sup> 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 1<sup>st</sup> day of August, 2005.



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ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
<p><b>Internal Sprint Emails and Related attachments</b>  <b>(tgsn_EF290624, KMCRC1405052004, KMC09102003, KMC022504, ef003560 cdrS, and EF290624 on CD only)</b></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><b>20040202-20031118 EST KMM CLEC CDR'S (on CD only)</b></p>	<p>Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and Order No. PSC-05-0648-CFO-TP</p>
<p><b>20031024-20030711 GMT KMM CLEC CDR'S (on CD only)</b></p>	<p>Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and Order No. PSC-05-0648-CFO-TP</p>
<p><b>Supplemental Attachment to POD #12 (entire document)</b></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><b>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)</b></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)**

**\*CONFIDENTIAL\***

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

**\*CONFIDENTIAL\***

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

**\*CONFIDENTIAL\***

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

**\*CONFIDENTIAL\***

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



**\*CONFIDENTIAL\***

**(ccrkmc 041904.xls & Southern CDRs  
8\_6\_04 on CD only)**