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100176-TP

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February 2, 2011

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-FPSC
11 FEB -2 PM 4:16
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 Second Request for Confidential Classification, including Exhibits A and C; and
2. An envelope containing Confidential Exhibit B.

DOCUMENT NUMBER-DATE
00822 FEB-2-
FPSC-COMMISSION CLERK

February 2, 2011

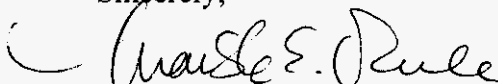
Page 2

As set forth in Sprint's Second Request for Confidential Classification, Sprint claims the highlighted portions of Confidential Exhibit B as confidential and proprietary business information belonging to Sprint, which 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 that reads "Marsha E. Rule". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Marsha E. Rule

Enclosures

cc: Parties of Record per certificate of service

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

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: February 2, 2011

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC
 For DN 00823-11, which is in locked storage. You must be authorized to view this DN.-CLK

SPRINT'S SECOND 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.

COM _____
 APA _____
 ECR _____
 GCL 1
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 ADM _____
 OPC _____
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DOCUMENT NUMBER-DATE

00822 FEB-2 =

FPSC-COMMISSION CLERK

- (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).

Sprint's Response to Staff Interrogatory No. 81

2. On January 25, 2011, Sprint served its Response to Staff's Second Set of Interrogatories (Nos. 63-113). Sprint's response to Interrogatory No. 81 was filed pursuant to a Notice of Intent to Claim Confidential Classification, and was provided to AT&T pursuant to the parties' protective agreement. A copy of the redacted version of Sprint's Response is attached hereto as **Exhibit A**. A highlighted copy of the unredacted version of is submitted separately as **Confidential Exhibit B**. **Exhibit C** includes the justification for confidential classification of the information highlighted in the Confidential Exhibits attached hereto.

3. Sprint's Confidential Response to Interrogatory No. 81 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. This information is also carrier/customer proprietary network information, the confidentiality of which is protected by 47 USC § 222.

4. Upon a finding that the information highlighted in Exhibit B 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 2nd day of February, 2011.



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Attorneys for Sprint

CERTIFICATE OF SERVICE

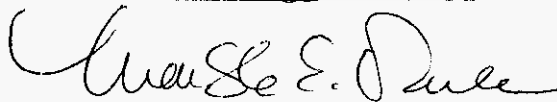
The undersigned hereby certifies that a copy of the foregoing has been served on the following by First Class Mail this 2nd day of February, 2011:

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
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Florida Public Service Commission:
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Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
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Marsha E. Rule

EXHIBIT A

Sprint/Nextel's Response to Staff's Second Set of Interrogatories
Nos. 63-113
Docket Nos. 100176-TP and 100177-TP
Page 19

81. See Page 78, Lines 7-8.

a. Is InterMTA traffic currently in balance between the parties?

No.

b. If not, please identify what percentage of traffic each party handles.

******[BEGIN SPRINT / AT&T PROPRIETARY]******

******[END SPRINT / AT&T PROPRIETARY]******

Response provided by:
Randy Farrar
6450 Sprint Parkway Overland Park, KS 66251
Senior Manager – Interconnection Support

**CONFIDENTIAL
EXHIBIT B**

[FILED UNDER CONFIDENTIAL COVER]

EXHIBIT C
TO SPRINT'S SECOND REQUEST FOR CONFIDENTIAL CLASSIFICATION

CONFIDENTIAL INFORMATION	LOCATION	REASON
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. This information is also carrier/ customer proprietary network information, the confidentiality of which is protected by 47 USC § 222.

State of Florida



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

**Marsha Rule
P.O. Box 551
Tallahassee FL 32301**

Re: Acknowledgement of Confidential Filing in Docket No. 100176-TP

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on February 2, 2011, in the above-referenced docket.

Document Number 00823-11 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.