



Via Hand Delivery

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ORIGINAL

February 16, 2001

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED-TPSC
01 FEB 16 PM 4:42
RECORDS AND
REPORTING

Re: Docket No. 001503-TP, Number Pooling Cost Recovery and Allocation Issues

Dear Ms. Bayó:

Enclosed for filing are the original and seven (7) copies of:

1. Post Workshop Comments 02241-01
2. Request for Confidentiality (Redacted Version) 02242-01

The confidential portions of the Post Workshop Comments, Attachment 2, are being filed under seal by separate letter. Copies of the above are hereby served on the parties of record pursuant to the attached certificate of service.

02243-01

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

Sincerely,

Susan S. Masterton

SSM/tk

Enclosures

RECEIVED & FILED
WMM
FPSC-BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Cost recovery and allocation issues)	Docket No.: 001503-TP
For number pooling trials in Florida)	Filed: February 16, 2001
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Sprint's Request for Confidential Classification Pursuant to Section 364.183(1), Florida Statutes

Sprint-Florida, Incorporated, Sprint Communications Company Limited Partnership and Sprint PCS (collectively "Sprint") hereby request that the Florida Public Service Commission (Commission) classify certain documents and/or records identified herein as confidential, exempt from the public disclosure under Chapter 119, Florida Statutes, and issue any appropriate protective order reflecting such a decision. The information that is the subject of this request is contained in the Attachments to Sprint's Post Workshop Comments filed in this docket.

1. The following document is the subject of this request:
 - a. Attachment 2 to Sprint's Post Workshop Comments (Number Pooling Surcharge).
2. One unredacted copy of Attachment 2 has been submitted to the Division of Records and Reporting under seal this same day.
3. The information for which this request is submitted is trade secret and other highly proprietary contractual, competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3)(a), (d), and (e). Section 364.183(3) provides:

DOCUMENT NUMBER-DATE

02242 FEB 16 2001

FPSC-RECORDS REPORTING

(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 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.

4. Furthermore, Section 688.002(4), Florida Statutes, is instructive on what constitutes a trade secret and provides that:

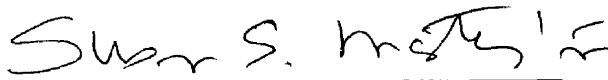
- (4) “Trade secret” means information, including a formula, pattern, compilation, program, device, method technique, or process that:
 - (a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and
 - (b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

5. The information for which confidentiality is requested identifies trade secrets and information that relates to competitive interests of Sprint.

Based on the foregoing, 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 16th day of February 2001.

SPRINT

A handwritten signature in cursive script, reading "Susan S. Masterton", written over a horizontal line.

Susan S. Masterton

Attorney

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850-599-1560

CERTIFICATE OF SERVICE

DOCKET NO. 001503-TP

I hereby certify that U.S. Mail or hand-delivery served a true and correct copy of the foregoing this 16th day of February, 2001 to the following:

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