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November 5, 2003

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 030868-TL

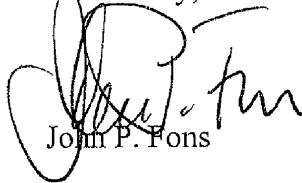
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Sprint's Request for Confidential Classification and Protective Order Pursuant to Section 364.183(1), Florida Statutes.

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

Thank you for your assistance in this matter.

Yours truly,



John P. Fons

Enclosures

cc: Certificate of Service List

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DOCUMENT NUMBER-DATC

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FPSC COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: SPRINT-FLORIDA, INCORPORATED'S
PETITION TO REDUCE INTRASTATE
SWITCHED NETWORK ACCESS RATES TO
INTERSTATE PARITY IN A REVENUE
NEUTRAL MANNER PURSUANT TO
SECTION 364.164(1), FLORIDA STATUTES

DOCKET NO.: 030868-TL
FILED: November 5, 2003

**SPRINT'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND PROTECTIVE ORDER
PURSUANT TO SECTION 364.183(1), FLORIDA STATUTES**

On October 16, 2003, Sprint-Florida, Incorporated ("Sprint") filed its Notice of Intent to Request Confidential Classification. Sprint hereby requests 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 a protective order reflecting such decision and protecting the information in the possession of the Commission and the Office of the Public Counsel. The information that is the subject of this request is contained in certain documents contained in Sprint's Response to Staff's Second Request for Production of Documents (Nos. 16 and 19) served on the Staff of the Commission and Office of Public Counsel on October 16, 2003.

1. The following documents or excerpts from documents are the subject of this request:

- a. **Sprint's Response to Staff's Second Request for Production of Documents No. 16, Switching Inputs, page 1 of 5 (CD-ROM)**
- b. **Sprint's Response to Staff's Second Request for Production of Documents No. 19, Florida Customer Usage Study, page 1 through 3 of 3**

2. One unredacted copy of the information has been submitted to the Division of Records and Reporting under seal this same day. The confidential information is identified by gray highlighting. Two redacted copies of the information are attached to this request.

3. The information for which the Request is submitted is trade secret or other highly proprietary competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment "A".

4. Section 364.183(3), 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.

(f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

5. 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.

6. The subject information has not been publicly released. Furthermore, release of the information could impair the company's ability to compete for, or negotiate with, certain business customers.

WHEREFORE, based on the foregoing, Sprint respectfully requests that the Commission grant Sprint's Request for Confidential Classification, exempt the information from disclosure under Chapter 119, Florida Statutes and issue a protective order, protecting the information from disclosure while it is maintained at the Commission and in the possession of the Office of the Public Counsel.

RESPECTFULLY SUBMITTED this 5th day of November, 2003.



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ATTORNEYS FOR SPRINT-FLORIDA,
INCORPORATED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail, e-mail or hand delivery (*) this 5th day of November, 2003, to the following:

Beth Keating, Esq. (*)
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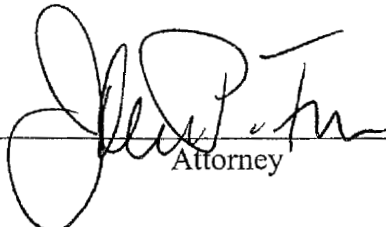
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Attorney

ATTACHMENT A

| Document and Page and Line Numbers | Justification for Confidential Treatment |
|---|--|
| <p>a. Sprint's Response to Staff's 2nd Request for Production of Documents No. 16, Switching Inputs, page 1 of 5 (CD-ROM)</p> <ul style="list-style-type: none"> - Column E, lines 7-52 - Column F, lines 7, 36-46 - Column G, lines 36-48 - Column J, lines 40-52 - Column K, lines 12, 13 and 53 - Column L, lines 12, 13 and 15 - Column M, lines 12, 13 and 15 - Column N, lines 12, 13, 15, 16 18 and 20 | <p>The switch-related data is proprietary to Sprint's switch vendor and Sprint. The disclosure of this information would harm Sprint's ability to negotiate favorable terms and conditions with its switching vendors and would provide Sprint's competitors with costing information that would enhance their ability to price switch-related services to Sprint's detriment.</p> |
| <p>b. Sprint's Response to Staff's Second Request for Production of Documents No. 19, Florida Customer Usage Study, page 1 through 3 of 3</p> <ul style="list-style-type: none"> - page 1 of 3, column B, lines 17, 18, 20 and 21 - page 2 of 3, columns C-N, lines 11, 12, 19, 20, 27 and 28 - page 3 of 3, columns C, D, and O-Y, lines 11, 12, 19 and 20; columns C and D, lines 27 and 28 | <p>The customer usage information relates to a competitive Sprint service. The disclosure of this user information would be of significant value to Sprint's competitors who would have this information at no cost to them. In turn, Sprint's competitors could use this information to price and market their comparable services in a manner which would adversely affect Sprint's ability to market its service.</p> |