



Susan S. Masterton
Attorney

Law/External Affairs
FITLHO0107
Post Office Box 2214
1313 Blair Stone Road
Tallahassee, FL 32316-2214
Voice 850 599 1560
Fax 850 878 0777
susan.masterton@mail.sprint.com

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. 02819-05
2. Request for Confidential Classification for Document No. 03018-05
3. Request for Confidential Classification for Document No. 03445-05
4. Request for Confidential Classification for Document No. 04444-05

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 / 
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 1st day of August, 2005 to the following:

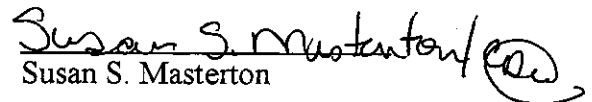
Division of Legal Services
Lee Fordham/ Beth Keating
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Nancy Pruitt/Ann Marsh
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

KMC Data LLC/KMC Telecom III LLC/KMC Telecom V, Inc.
Marva B. Johnson/Mike Duke
1755 North Brown Road
Lawrenceville, GA 30043-8119

Kelley Drye & Warren LLP
Chip Yorkgitis / Barbara Miller
1200 19th Street, N.W.,
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) 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 paragraph 3. 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. Second Supplemental Attachment to POD #15 (KMC Revenue Impacts) – entire document

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. 02819-05 on March 22, 2005

3. The information for which the Request is submitted contains 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.

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.
 - (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 1st day of August, 2005.

Susan S. Masterton

Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560
850/878-0777
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

CONFIDENTIAL

KMC Revenue Impact

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)	
Agreement and Sprint's tariffs and for violation of)	Filed: August 1, 2005
Section 364.16(3)(a), Florida Statutes.)	
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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 paragraph 3. 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 portion of Response to KMC's 2nd Set of Interrogatories, #36**

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. 03018-05 on March 29, 2005.

3. The information for which the Request is submitted contains CLEC customer account information that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.

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.
 - (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 1st day of August, 2005.

Susan S. Masterton (signature)

Susan S. Masterton

Post Office Box 2214

Tallahassee, Florida 32316-2214

850/599-1560

850/878-0777

susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

(b) (i) [REDACTED] (ii) Sprint sent a letter demanding payment on August 10, 2004 (iii) the basis for the claim was failure to pay access charges for access traffic improperly terminated over local interconnection trunks (iv-v) the parties have been and are continuing to engage in discussions to resolve the dispute

(c) See Response to POD 25.

Response provided by: Terry McCulloch, Field Sales Manager

Interrogatory 37: Please identify and describe all notes, documentation, communications, emails, correspondence, and other references to Sprint-FL's understanding of, interpretation of, application of, implementation of, or negotiations of the Florida Digital Networks Interconnection Agreement as it relates to traffic routed or delivered between KMC and Sprint-FL.

Response: Please refer to Sprint's objections filed March 17, 2005.

Interrogatory 38: Please state by number of calls and MOUs on a monthly basis for each month beginning in March 2002 through the present the amount of traffic sent by Sprint-FL to KMC over local interconnection trunks in Florida. Break down such traffic, on a monthly basis, into (a) Sprint-FL originated traffic that is not intra-LATA toll, (b) Sprint-FL originated traffic that is either Section 251(b)(5) traffic or ISP-bound traffic, or (c) other types of traffic. If there are any "other types of traffic," please describe each such type.

Response: Please refer to Sprint's objections filed March 17, 2005.

Interrogatory 39: Identify and describe every complaint, notice, or inquiry received since March 1, 2002, from any LEC or other entity with operations in Florida that Sprint IXC is improperly misrouting traffic that is destined for termination in Florida, is improperly manipulating, inserting, altering, or replacing signaling information, or is engaging in activities by which Sprint IXC is evading access charges.

Response: Please refer to Sprint's objections filed March 17, 2005.

Interrogatory 40: Please identify the number of calls and MOUs for each month, March 2002 through the present that Sprint IXC delivered directly to the ILEC access tandem or ILEC end offices through direct end office connections in the following markets: Clearwater, Daytona Beach, Ft. Myers, Melbourne, Pensacola, Sarasota and Tallahassee.

Response: Please refer to Sprint's objections filed March 17, 2005.

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)	
Agreement and Sprint's tariffs and for violation of)	Filed: August 1, 2005
Section 364.16(3)(a), Florida Statutes.)	
_____)	

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 paragraph 3. 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:

Attachment to Supplemental Response to Interrogatory #21 to KMC's 1st Set of Interrogatories and POD's – KMC Account Reconciliation (entire document)

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. 03445-05 on April 7, 2005.¹

¹ The following document included in Document No. 03445-05 has already been granted confidential classification by the Commission: Attachment to 2d Supplemental Response to POD #1 to KMC's 1st Set of Interrogatories and POD's (On CD Only) – Order No. PSC-05-0542-CFO-TP and PSC-05-0648-CFO-TP.

3. The information for which the Request is submitted KMC customer account information that Sprint is required by law (s. 364.24, F.S.) or contract (Sprint's interconnection agreements) to keep confidential. 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.

(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 1st day of August, 2005.

Susan S. Masterton / (ms)

Susan S. Masterton
Post Office Box 2214
Tallahassee, Florida 32316-2214
850/599-1560
850/878-0777
susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Attachment to Supplemental Response to Interrogatory #21 to KMC's 1 st Set of Interrogatories and POD's – KMC Account Reconciliation (entire document)	This information is KMC customer account information that Sprint is required by law (s. 364.24, F.S.) and contract (Sprint's interconnection agreements) to keep confidential.
Attachment to 2d Supplemental Response to POD #1 to KMC's 1 st Set of Interrogatories and POD's (On CD Only)	Granted confidential classification pursuant to Order No. PSC-05-0542-CFO-TP and Order No. 05-0648-CFO-TP

CONFIDENTIAL

KMC Account Reconciliation

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)	
Agreement and Sprint's tariffs and for violation of)	Filed: August 1, 2005
Section 364.16(3)(a), Florida Statutes.)	
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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 paragraph 3. 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 of Response to Staff Interrogatory #8**
2. **Attachment to Staff Interrogatory #9 CD labeled CCRKMC03262004.zip (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 as Document No. 04444-05 on May 5, 2005.¹

¹ Document No. 04444-05 included the following specific document which Sprint has determined is not confidential and, therefore, should be moved to the public file: Attachment to Staff Interrogatory #6 SS7 CDR Column Description for Complaint

3. The information for which the Request is submitted contains information that is confidential proprietary 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.
 - (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 1st day of August, 2005.

Susan S. Masterton (cm)

Susan S. Masterton

Post Office Box 2214

Tallahassee, Florida 32316-2214

850/599-1560

850/878-0777

susan.masterton@mail.sprint.com

ATTORNEY FOR SPRINT

ATTACHMENT A

Document and page and line numbers	Justification for Confidential Treatment
Highlighted portions of Response to Staff Interrogatory #8	This information includes KMC or other customer account information (selected call detail records) that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.
Attachment to Staff Interrogatory #6 SS7 CDR Column Description for Complaint	Can be moved to public file
Attachment to Staff Interrogatory #9 CD labeled CCRKMC03262004.zip (On CD Only) (entire CD)	This information includes customer account information (call detail records for Sprint-originated calls) that Sprint is required by law (s. 364.24, F.S.) and/or contract (Sprint's interconnection agreements) to keep confidential.

- b. Through discovery and from KMC testimony, Sprint understands that KMC is asserting that the intermediate carrier was Customer X. This configuration is shown in the diagram Attached to Interrogatory No. 2 and labeled as Exhibit 1.

Interrogatory 8: Please refer to your confidential Responses to KMC's First Request for Production of Documents, attachments to Sprint emails on the CD, filed March 17, 2005, file ef003560 cdrS.xls.

- a. In reviewing the data contained in the spreadsheets, it appears that certain calls have no calling party number, but have both a called party number and a charge party number that appear to be local Tallahassee numbers. See, for example, row 130. Please explain your understanding as to why such calls have no calling party number shown.
- b. It appears that certain calls have a calling party number, a called party number and a charge party number that are all different, but all appear to be local Tallahassee numbers. See, for example, row 800. Please explain your understanding as to why all three numbers are different.
- c. It appears that certain calls have a charge party number that consists of four digits. The calling party number and called party number appear to be local Tallahassee numbers. See, for example, row 1056. Please explain what the four digits represent and why only four digits are shown.

Response: While these examples exist in the file referenced above, it must be noted that although there was a great amount of traffic that went over this trunk group that is in dispute, some traffic in this file are normal calls and thus may have records that appear different from the records of the traffic that is in dispute. The following information is an explanation of the configuration of the call and the recording capabilities used for the recording of these types of calls. The subject three records all appear to be valid local calls that were included in the subject file which is based on a 24 hour period on August 11, 2003, and, hence, included all calls sent to Sprint over the specified local trunk group for termination by Sprint to end user customers.

- a. The following number sequence was found for line 130 in the spreadsheet referenced above:

OPC	DPC	Charge #	Calling #	Called #
██████	██████	██	██████████	█	██████████

In this line of information, the calling party is indeed absent from the SS7 information received. Blocking of the Calling Party Number (CPN) is an optional parameter of the customer's switch. Thus, in this situation it appears that means that the customer's CPE has been programmed so that the calling number is not sent to the Public Switched Telephone Network (PSTN) switch. In fact, in looking at all calls sent to Sprint from this charge number, all calls (33 occurrences) did not have a CPN.

b. The following number sequence was found for line 800 in the spreadsheet referenced above:

OPC	DPC	Charge #	Calling #	Called #
██████	██████	██████	██████	██████	██████

This appears to be a situation where calling forwarding is involved, i.e., when the call is dialed to a telephone number that is set up to forward the call to another telephone number. The following paragraph describes this call forwarding capability in a PSTN switch.

This situation can occur if a call has been forwarded from an original called number to a number that the customer of the called number has forwarded his number to. While charges in the above call sequence scenario are not applicable because it is a local call forwarded to a local telephone number, it is necessary for the switch to insert the appropriate charge party number so that when toll charges do apply, the information is included in the call record. That is, if the called party forwarded calls from a home phone to a long distance telephone number, the original calling party should not be expected to pay the long distance charge for forwarding the call from the dialed telephone to the forwarded telephone number which potentially could be a toll call. In this case, calling party, ██████, has called ██████, which has forwarded their calls to ██████. The calling party would be expected to

be charged any charge (if a toll call) to the original number, but not for any charge from the forwarding telephone number to the forwarded telephone number. In this case, the PSTN switch will insert the number of the original called party into the charge party field and send the call to the forwarded called party [REDACTED]. Thus, the forwarding telephone would be billed for any applicable charges for the forwarded portion of the call.

- c. *Please note that while your question states that the charge number was a 4 digit number, our file notes that the 4 digit code occupied the calling party number.*

The following number sequence was found for line 1056 in the spreadsheet referenced above:

OPC	DPC	Charge #	Calling #	Called #
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

For ISDN PRI PBX capabilities, the calling party number can be anything from 1-15 digits if coded as a private number. In this example, the [REDACTED] would have been set by the customer at the PBX to denote an extension number or account number. The following is an excerpt from the Lucent Technical Document 235-190-104, that states this capability in the Lucent 5ESS switch.

The CPN can be provided by the CPE, if the originating interface is ISDN BRI or PRI, or by the 5ESS® switch. The user-provided CPN is in the Calling Party Number Information Element (CPN IE) in the Q.931 SETUP message from the CPE. A number provided by the CPE may or may not be a number that can be dialed to reach the calling party. The user-

provided number could be a personal identification number or some other number that could be used by the terminator to identify the calling party. A user-provided CPN may have 1 to 15 digits if it is for a private numbering plan. If the user-provided number is a subscriber number in the ISDN numbering plan, it must have seven digits. If the user-provided number is a national number, it must have ten digits.

NOTE: The CPE is used to mean the terminal connected via BRI or a PBX connected via a PRI.

In this instance the customer with charge number [REDACTED] has sent a 4 digit number in the calling number field that will be shown to the called party. In fact the records for this charge number has all calling party number noted as [REDACTED] (56 instances). This shows that the PRI that was connected to the customers PBX passed that number and was set up by the customer.

Interrogatory 9: Did Sprint act as an IXC for any of the traffic that was routed through Customer X as asserted by KMC witness Johnson on page 13, lines 14-16 of her direct testimony? If yes, please explain.

Response: From the SS7 records, Sprint LTD is not able to identify the IXC on all calls, but only on some calls that both originate and terminate to Sprint LTD end users (correlated calls). Sprint conducted a study using one day's worth of correlated SS7 call records (call records from one single call passing through Sprint's local network more than once). Although the sample is limited to correlated calls only, Sprint was able to identify the IXC for some of those calls that terminated to Sprint from KMC. By using the original leg of the correlated calls, where the calling party was a Sprint LTD customer or Sprint was serving as a tandem provider for the originating CLEC, Sprint was able to identify which IXC carrier the customer was PIC'd to. The IXC was identified by both the CIC (Carrier Identification Code) and by the IXC trunk group

CONFIDENTIAL

**On CD Only
(CCRKMC03262004.zip)**