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September 3, 2003

Ms. Blanca Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

RE: Docket No. 030296-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of Sprint are the following:

- 1. The original and fifteen copies of Sprint's Request for Confidential Classification pursuant to Section 364.183(1), Florida Statutes.
- 2. The original and one copy of Sprint's Notice of Service of Supplemental Response to Staff's First Set of Interrogatories (No. 3b)

Copies are being served on the parties in this docket pursuant to the attached Certificate of Service.

Please acknowledge receipt of this filing by stamping and initialing a copy of this letter and returning same to the courier. If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

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CTR

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MMS

Susan S. Masterton

Enclosures

This confidentiality request was filed by or for a "telco" for DN 08220-03 No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC. See DN 06922

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CERTIFICATE OF SERVICE DOCKET NO. 030296-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served both Electronic Mail and U.S. Mail this 3rd day of September, 2003 to the following:

AT&T

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& TCG South Florida Ms. Lisa A. Riley 1200 Peachtree Street, N.E., Ste. 8026 Atlanta, GA 30309-3579 Email: lisariley@att.com

AT&T Communications of the Southern States, LLC Tracy Hatch 101 North Monroe Street, Suite 700 Tallahassee, FL 32301 Email: <u>thatch@att.com</u>

Womble Carlyle Law Firm Loretta A. Cecil, Esq. 1201 West Peachtree St. Suite 3500 Atlanta, GA 30309 Email: <u>lcecil@wcsr.com</u>

Linda Dodson, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0870 Email: <u>ldodson@psc.state.fl.us</u>

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Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of AT&T Communications of the) Southern States, LLC and TCG South Florida) For Arbitration of Certain Terms And Conditions) Of A Proposed Interconnection Agreement with) Sprint- Florida, Incorporated pursuant to 47 U.S.C.) Section 252) Docket No. 030296-TP

Filed: September 3, 2003

Sprint's Request for Confidential Classification Pursuant to Section 364.183(1), Florida Statutes

Sprint-Florida, Incorporated (hereinafter "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 any appropriate protective order reflecting such a decision.

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

Revised Attachment 1 to Sprint's Supplemental Response to Interrogatory No. 3

2. Redacted copies of Revised Attachment 1 to Sprint's Supplemental Response to Interrogatory No. 3 are not included, as Sprint is requesting confidential classification for the entire document. One unredacted copy of the confidential information is being filed under seal with the Division of Records and Reporting this same day.

3. The information for which the Request is submitted is information relating to the competitive interests of Sprint or Sprint's wholesale customers, the disclosure of which would impair Sprint's or it's wholesale customers' competitive business. Specific justification for confidential treatment is set forth in Attachment A. Sprint previously

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DOCUMENT NUMBER MATE 08219 SEP -3 6 FESC-CONTROLOGY CLERK filed a Request for Confidential Classification on August 20, 2003 for similar information

contained in its original discovery response.

- 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. The subject information has not been publicly released. Furthermore, release of the information could impair the Sprint's or its wholesale customers' competitive business interests.

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 3rd day of September 2003.

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Shan S r

Susan S. Masterton Post Office Box 2214 Tallahassee, Florida 32316-2214 850/599-1560

ATTORNEY FOR SPRINT

ATTACHMENT A

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Document and page and line numbers	Justification for Confidential Treatment
Revised Attachment 1 to Sprint's Supplemental Response to Interrogatory No. 3 (entire document)	Contains competitively sensitive information relating to the location of Sprint's wholesale customer's (AT&T's) POIs, disclosure of which will impair AT&T's competitive business interests.