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**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

COMPLAINT OF SPRINT COMMUNICATIONS	)	
COMPANY L.P. AGAINST BRANDENBURG	)	CASE NO.
TELEPHONE COMPANY AND REQUEST FOR	)	2008-00135
EXPEDITED RELIEF	)	

**PETITION FOR CONFIDENTIALITY**

Sprint Communications Company L.P. (“Sprint”) petitions the Commission pursuant to 807 KAR 5:001, Section 7, K.R.S. Section 61.878, and all other applicable law, for confidential treatment of certain Attachments to the discovery Responses submitted concurrently under seal by Sprint pursuant to the Commission’s Order, dated August 1, 2008, in the above-referenced docket (“Order”). Specifically, the information to be afforded confidential treatment is contained in Confidential Attachments DR-2, DR-6, DR-7, DR-11, and DR-15 to Sprint’s discovery Responses. Information for which confidential treatment is requested includes: the precise physical location and other identifying information relating to sensitive, critical network infrastructure, such as wireline and wireless switches (Confidential Attachments DR-2, DR-6, and DR-11) and cell sites (Confidential Attachment DR-7); and customer proprietary network information (“CPNI”) and other sensitive customer information included in call detail records (Confidential Attachment DR-15). In support of its Petition, Sprint respectfully shows as follows:

1.

By its Order dated August 1, 2008, the Commission directed the parties to submit responses to discovery requests by August 29, 2008. Sprint requests that the information contained in Confidential Attachments DR-2, DR-6, DR-7, DR-11, and DR-15 to Sprint's discovery Responses be afforded confidential treatment. Based on the reasons set forth below, the information in question is entitled to confidential treatment under 807 KAR 5:001, Section 7, and all other applicable law.

2.

Brandenburg Telephone Company ("Brandenburg") has issued discovery requests in which Brandenburg has requested information relating to critical network infrastructure, and CPNI and other sensitive customer information, which if publicly disclosed, could have adverse consequences to Sprint and to Sprint's customers.

3.

Sprint would not as a matter of company policy publicly disclose information like that attached to Sprint's discovery Responses, except as required by law or pursuant to a court order or subpoena. Sprint's internal policies are directed toward non-disclosure of the information in question. In fact, the information will not be disclosed to any personnel of Sprint except those who need to know in order to discharge their responsibilities. The information sought by Brandenburg is not information customarily disclosed to the public and is generally recognized as confidential and proprietary.

4.

There is no significant interest in public disclosure of the attached information. Any public interest in favor of disclosure of the information is outweighed by the interest

in keeping the information confidential, thereby enabling Sprint to protect its sensitive network infrastructure in Kentucky and other states, and to protect CPNI and other sensitive customer information. Disclosure of the information in question would put Sprint at a strategic and security-related disadvantage. Moreover, the public interest would be best served by the nondisclosure of the materials in question because network safety and confidentiality of customer-specific information would thereby be promoted.

5.

The information that Sprint seeks to be afforded confidential treatment also constitutes a trade secret under the two prong test of KRS 365.880: a) the economic value of the information is derived by not being readily ascertainable by other persons who might obtain economic value by its disclosure; and, b) the information is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. Both of the statutory tests are met in this instance. Only Sprint is in a position to know the information attached to Sprint's discovery Responses. The economic value of this information is derived by Sprint maintaining the secrecy of the information.

6.

Moreover, as the Commission knows, access to CPNI is highly restricted pursuant to federal law, i.e., 47 U.S.C. Section 222.

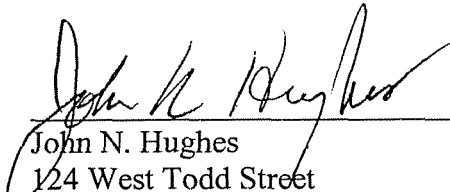
7.

Pursuant to 807 KAR 5:001, Section 7(3), temporary confidentiality for the enclosed information should be maintained until the Commission enters an Order as to this Petition. Once the Order regarding confidentiality has been issued, Sprint would

have twenty (20) days to seek alternative remedies pursuant to 807 KAR 5:001, Section 7(4).

Sprint petitions the Commission to treat as confidential all of the information identified in, and filed under seal concurrently with, this Petition.

Ssubmitted this 29th day of August, 2008.



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