

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

In the Matter of: )  
)  
MCI COMMUNICATIONS SERVICES, INC.; )  
BELLATLANTIC COMMUNICATIONS, INC.; )  
NYNEX LONG DISTANCE COMPANY; TTI )  
NATIONAL, INC.; TELECONNECT LONG )  
DISTANCE SERVICES AND & SYSTEMS )  
COMPANY; AND VERIZON SELECT )  
SERVICES, INC. )

COMPLAINANTS )

v. )  
)  
WINDSTREAM KENTUCKY WEST, INC.; )  
WINDSTREAM KENTUCKY EAST, INC. – )  
LEXINGTON; AND WINDSTREAM )  
KENTUCKY EAST, INC. – LONDON )

DEFENDANTS )

**RECEIVED**  
APR 24 2009  
PUBLIC SERVICE  
COMMISSION

Case No. 2007-00503

**SPRINT NEXTEL’S PETITION FOR  
CONFIDENTIAL TREATMENT**

Sprint Communications Company L.P., Sprint Spectrum L.P., Nextel West Corp., and NPCR, Inc. d/b/a Nextel Partners (collectively, “Sprint Nextel”), by counsel, and pursuant to 807 KAR 5:001, Section 7, hereby petition the Kentucky Public Service Commission (“PSC”) for an Order granting confidential treatment to portions of their April 24, 2009 response to the Commission Staff’s First Information Request to Sprint Nextel in the above captioned case (“Response”). In support of this petition, Sprint Nextel states as follows:

1. Sprint Nextel is requesting confidential treatment for three portions of its Response: (1) Sprint Nextel’s average intrastate switched access cost per minute for the three Kentucky Windstream entities (Response to Request No. 1); (2) the average intrastate switched

access rate Sprint Nextel expects to pay to all LECs in Kentucky and six other states (Response to Request No. 1); and (3) Sprint Nextel's estimated annual savings on intrastate switched access costs if Windstream's intrastate switched access rates in Kentucky are set at the same level as its interstate aggregate per minute switched access rate (Response to Request No. 2).

2. These portions of Sprint Nextel's Response contain proprietary information that would aid competitors of Sprint Nextel and such proprietary trade secret information is subject to protection from disclosure pursuant to Kentucky law. See KRS 61.870, et seq.

3. The portions of Sprint Nextel's Response for which confidential treatment is sought are specific dollar figures related to Sprint Nextel's costs of providing service in Kentucky and other jurisdictions. This information constitutes a trade secret because it is commercial information that, if disclosed, could cause substantial competitive harm to Sprint Nextel. This information is not publicly available. The figures are derived from Sprint Nextel's intrastate switched access usage for which it compensates various local exchange carriers at various tariffed rates. Although the tariffed rates are publicly available, the costs and rates derived and provided in the Response are based on highly proprietary Sprint Nextel network and traffic information and represent highly confidential costs of providing service. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this form, they could use it to the competitive detriment of Sprint Nextel.

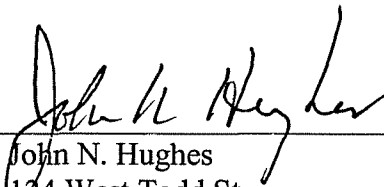
4. Providers of the services offered by Sprint Nextel, including wireless, retail and wholesale wireline long distance, and wholesale telephony-related services operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.

5. This information is not generally disclosed to non-management employees of Sprint Nextel and is protected internally by the Company as proprietary information.

6. The disclosure of this proprietary information would result in significant or irreparable competitive harm to Sprint Nextel by providing its competitors with non-reciprocal competitive advantage. No public purpose is served by the disclosure of such information, and the Regulations of the PSC contemplate the filing of such information under Confidentiality Order.

7. The three portions of the Response for which confidential treatment is sought are highlighted in the sealed copy of the Response that is provided with this Petition. Pursuant to the preceding discussion, Sprint Nextel requests that this information be deemed confidential by the PSC.

WHEREFORE, Sprint Nextel respectfully requests that the PSC enter all necessary Orders granting confidential treatment as requested herein.

  
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CERTIFICATE OF SERVICE

I certify that the First Response for Information of Sprint Communications Company L.P. has been served by mailing to the following parties:

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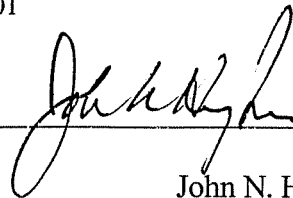
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