



Jay C. Keithley
Vice President

Federal Regulatory Affairs
401 9th Street, Northwest, Suite 400
Washington, D.C. 20004
Voice 202 585 1920
Fax 202 585 1896
jay.c.keithley@mail.sprint.com

RECEIVED

MAR 31 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 31, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

RE: In the Matter of Federal-State Joint Board on Universal Service,
CC No. Docket 96-45, CC Docket No. 97-160
Ninth Report and Order and Eighteenth Order on Reconsideration, released
November 2, 1999.

Dear Ms. Roman Salas:

Pursuant to 47 C.F.R. 36.612(a)(2), the Sprint Local Telephone Companies ("Sprint LECs") are today filing certain documents to be used by the National Exchange Carrier Association ("NECA") in determining universal service fund support amounts for non-rural carriers. Specifically, pursuant to rules revised in the above-cited orders, each non-rural local exchange company ("LEC") is to provide to NECA information reflecting the number of loops the carrier maintains in each study area, by wire center (see, 47 C.F.R. Rule 36.611(h)). The Sprint LECs maintain that this information is commercial information that is privileged and confidential and not customarily disclosed to the public. Consequently, Sprint herein formally requests that these documents be withheld from public disclosure pursuant to 5 U.S.C. 552(b)(4) and 47 C.F.R. 0.457 and 47 C.F.R. 0.459 of the Commission's rules.

Public disclosure of the detailed line count information, especially when provided on a wire center basis, would likely result in substantial competitive harm to the Sprint LECs. The Sprint LECs are facing competition in their service territories and thus access to this type of detailed information by its competitors would expose the companies to targeted, "cream-skimming" competitive activities. In particular, competitors may use this information to target their services and markets, knowing in advance both the services and prices offered by the Sprint LECs in those same markets. For these reasons, this is not the type of information that the Sprint LECs - as competitors- would routinely share with the public in general or their competitors in particular. It is the companies' practice to withhold this information from public inspection as proprietary in all circumstances.

All information being submitted today includes the following legend: "Sprint Proprietary Information". At no time prior to its submission to NECA has the information contained in these times been shared with persons outside of Sprint, unless done so subject to a non-disclosure arrangement. It is for these reasons that Sprint requests continuing proprietary treatment of these documents. Sprint will, of course, comply with any Commission directive regarding the applicability of a standard Protective Order adopted by the Commission in this proceeding to the subject proprietary information.

If additional documents are requested other than those submitted today, Sprint will require an opportunity to review the documents and interpose additional confidentiality claims prior to their release.

Respectfully,



Jay C. Keithely