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April 29, 2002

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

Re: Docket No. 990649B-TP

Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

- 1. Responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, 67) (original request filed November 7, 2001); 04645-02
- 2. Confidential Exhibit DBT-3 (Direct Testimony of Dennis B. Trimble) (original request filed November 7, 2001); のりんりつこ
- 3. Responses to Staff's Second Set of Interrogatories (No. 59) and Second Request for Production of Documents (Nos. 27 and 44) (original request filed January 16, 2002);
- 4. Responses to Staff's Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58, 59) (original request filed January 25, 2002);
- 5. Responses to AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3,6,13,14) (original request filed 04653-02 February 27, 2002);
- 6. Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002); 04655-02

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- 7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002); O4657-02
- 8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and 54657-02
- 9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001).

Highlighted copies of the confidential information are attached in sealed envelopes together with one redacted copy and a line-by-line justification (Exhibit-C).

If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas Enclosures

c: Jason Fudge, Staff Counsel (w/e)

990649B-TP

Exhibit C Staff's Fifth Set of Interrogatories (No. 108)

PageNos.	Line(s)/Column(s)	Reason
Bates stamped document no. 2523	L2-9, col. F-N	Data contains labor rates. Labor rates are routinely granted confidential protection. Their disclosure to competitors would allow them to more successfully compete with Verizon in attracting and retaining employees, without the usual marketplace trial and error.
Bates stamped document no. 2524	L2-4, col. C-K	Data contains labor rates. Labor rates are routinely granted confidential protection. Their disclosure to competitors would allow them to more successfully compete with Verizon in attracting and retaining employees, without the usual marketplace trial and error.

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- Verizon Incentive Plan (VIP) is based on the established company VIP targets.

- Minimum and Maximum Ranges represent the established Verizon ranges as of July 2001.

- The hourly base rate calculation is calculated based on an average 2,080 hours worked annually. The calculation is Mid-Point/ 2,080 hours.