

**BEFORE THE PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE review: Local Circuit Switching for Mass Market Customers.

DOCKET NO. 030851-TP  
 ORDER NO. PSC-04-0192-CFO-TP  
 ISSUED: February 23, 2004

**ORDER GRANTING REQUEST FOR SPECIFIED CONFIDENTIAL CLASSIFICATION OF SPECIFIED VERIZON FLORIDA, INC. DOCUMENTS**

**I. Case Background**

In response to the Federal Communications Commission's ("FCC's") August 21, 2003, Triennial Review Order ("TRO"), this Commission opened two dockets to ascertain whether a requesting carrier is impaired by lack of access to certain incumbent local exchange companies' network elements.

Verizon Florida, Inc. (Verizon) has filed numerous Requests for Specified Confidential Classification for certain documents. The chart below shows the general date of the request and the document at issue.

Month of Request	Document No.	Attachment
<b>October</b>		
23 <sup>rd</sup>	10462-03	A
<b>November</b>		
18 <sup>th</sup>	11589-03	B
26 <sup>th</sup>	12093-03	C
<b>December</b>		
4 <sup>th</sup>	12436-03	D
4 <sup>th</sup>	12440-03	E
30 <sup>th</sup>	13546-03	F
31 <sup>st</sup>	13604-03	G
<b>January</b>		
18 <sup>th</sup>	00353-04	H
27 <sup>th</sup>	01193-04	I
28 <sup>th</sup>	01263-04	J
<b>February</b>		
13 <sup>th</sup>	02063-04	K
17 <sup>th</sup>	02239-04	L

DOCUMENT NUMBER-DATE

02664 FEB 23 8

FPSC-COMMISSION CLERK

Month of Request	Document No.	Attachment
February		
18 <sup>th</sup>	02314-04	M
18 <sup>th</sup>	02317-04	N

## II. Analysis

In its request, Verizon asks for protection of the specific pages and line numbers as set forth in Attachments A through N, which are attached and incorporated in this Order by reference. Verizon contends that release of this information would provide its competitors with an undue competitive advantage in that they would have access to this competitively sensitive, confidential information.

Florida law presumes that documents submitted to governmental agencies shall be public records. The only exceptions to this presumption are the specific statutory exemptions provided in the law and exemptions granted by governmental agencies pursuant to the specific terms of a statutory provision. This presumption is based on the concept that government should operate in the "sunshine." Rule 25-22.006(4)(c), Florida Administrative Code, provides that it is the Company's burden to demonstrate that the documents fall into one of the statutory examples set out in Section 364.183, Florida Statutes, or to demonstrate that the information is proprietary confidential information, the disclosure of which will cause the Company or its ratepayers harm.

Section 364.183(3), Florida Statutes, states that "proprietary confidential business information" is:

[o]wned 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.

Based on the definition of proprietary confidential business information in Section 364.183(3), Florida Statutes, it appears that the information for which Verizon seeks confidential classification is information that, if disclosed, would cause harm to Verizon's competitive interests and its business operations. Thus, this information qualifies as proprietary confidential business information under Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. As such, Verizon's request for confidential classification is hereby granted.

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Based on the foregoing, it is

ORDERED by Commissioner Charles M. Davidson, as Prehearing Officer, that Verizon Florida, Inc.'s Requests for Specified Confidential Classification of the documents referenced herein are hereby granted. It is further

ORDERED that pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, any confidentiality granted to the material specified herein shall expire eighteen (18) months from the date of the issuance of this Order in the absence of a renewed request for confidentiality pursuant to Section 364.183, Florida Statutes. It is further

ORDERED that this Order will be the only notification by the Commission to the parties concerning the expiration of the confidentiality time period.

By ORDER of Commissioner Charles M. Davidson, as Prehearing Officer, this 23rd day of February, 2004.



CHARLES M. DAVIDSON  
Commissioner and Prehearing Officer

(SEAL)

JLS/JPR

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

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Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.0376, Florida Administrative Code; or (2) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of the Commission Clerk and Administrative Services, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment INT 1 (Bates Nos. VZ 930 - VZ 931)	All highlighted text	This is competitively sensitive, confidential business information of Verizon that identifies the specific Verizon central offices that are manned versus those that are unmanned. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon and the ratepayers, by giving rise to significant security concerns. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.
Attachment INT 11, 12 (Bates No. VZ 932)	All highlighted text	This is competitively sensitive, confidential business information of Verizon that identifies the average work times of Verizon employees performing specified work activities within Verizon's central offices. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon and the ratepayers, and give Verizon's competitors an unfair competitive advantage. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors. Such information would be useful to CLECs making decisions regarding the deployment of their own work force.
Attachment INT 20 (Bates Nos. VZ 933 - VZ 938)	All highlighted text	This is competitively sensitive, confidential business information of Verizon that provides detailed information regarding specific

<p>Response to Interrogatory No. 25</p>	<p>All highlighted text</p>	<p>types of facilities deployed in Verizon's proprietary network. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly assist its competitors in the design and construction of their own networks. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p> <p>This is competitively sensitive, confidential business information of Verizon that provides forecast information regarding specific types of facilities deployed in Verizon's proprietary network. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly assist its competitors in the design and construction of their own networks. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>
<p>Attachment INT 40(c) (Bates No. 939)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information of that specifically identifies CLECs that maintain collocation facilities in Verizon central offices in Florida. Verizon maintains this information as confidential customer proprietary network information.</p>

<p>Attachment INT 44(d) (Bates Nos. VZ 940 - VZ 941)</p>	<p>Entire Document</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides the total UNE-P lines provided by Verizon, on a wire center basis, as of June, 2003. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly grant CLECs access to this competitive information and allow them to use this information to target their competitive efforts against Verizon on a wire center basis. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>
<p>Attachment INT 55(a) (Bates Nos. VZ 942 - VZ 943)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides the number of analog UNE-P lines provided by Verizon, on a wire center basis, as of June, 2003. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly grant CLECs access to this competitive information and allow them to use this information to target their competitive efforts against Verizon on a wire center basis. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>
<p>Attachment INT 55(b) (Bates Nos. VZ 944 - VZ 945)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides the number of UNE-P lines Verizon</p>

		<p>provided to CLECs, without also providing switching, on a wire center basis, as of June, 2003. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly grant CLECs access to this competitive information and allow them to use this information to target their competitive efforts against Verizon on a wire center basis. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>
<p>Attachment INT 55(d) (Bates Nos. VZ 946 - VZ 947)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides the number of analog switched small business and residential access lines on a wire center basis, as of June, 2003. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly grant CLECs access to this competitive information and allow them to use this information to target their competitive efforts against Verizon on a wire center basis. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>
<p>Attachment INT 56(a-e) (Bates Nos. VZ 948 - VZ 949)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides the number of retail access lines (voice grade equivalents) on a wire center basis, as of June,</p>



<p>Attachment INT 80 (Bates Nos. VZ 950 - VZ 956)</p>	<p>Entire document</p>	<p>2003. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly grant CLECs access to this competitive information and allow them to use this information to target their competitive efforts against Verizon on a wire center basis. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p> <p>This document is a Verizon internal method and procedure for that describes in detail Verizon's internal business practices for provisioning UNE loops. This document is maintained within the company in electronic format, in a proprietary database that is not available to the public or disclosed outside of Verizon. Verizon employees that have access to this information are required to maintain this information as proprietary. This information is competitively sensitive information that reflects Verizon's business operations and its disclosure would be unfair to Verizon since it would permit Verizon's competitors to have free access to Verizon's internal business practices, while Verizon does not have access to comparable information from its competitors. Finally, the document constitutes "trade secret" information as that term is defined in Florida Statutes, Section 812.081 and thus falls within the definition of "proprietary</p>
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<p>Attachment INT 85 Confidential CD (Bates No. VZ 957)</p>	<p>Entire CD</p>	<p>confidential business information" as defined in Florida Statutes, Section 364.183(3). See FL Stat. Section 364.183(3)(a).</p> <p>This is competitively sensitive, confidential business information that specifically identifies the number of collocation arrangements in Verizon central offices in Florida. Verizon maintains this information as confidential customer proprietary network information.</p>
<p>Attachment INT 88(c) (Bates No. VZ 968)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential business information that specifically identifies the number and type of collocation arrangements in Verizon central offices in Florida. Verizon maintains this information as confidential proprietary network information.</p>
<p>Attachment INT 107 (Bates No. VZ 969)</p>	<p>All highlighted text.</p>	<p>This is competitively sensitive, confidential business information of Verizon that provides demand forecasts for UNE-P, UNE-L, and resale. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon since it would unfairly assist its competitors in the design and construction of their own networks. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.</p>

<p>Attachment POD 1                  (Bates Nos. VZ000001;                  VZ000004 - VZ000009)</p>	<p>All documents</p>	<p>This document is a Verizon internal method and procedure for that describes in detail Verizon's internal business practices (project coordination and management procedures) for Project Hot Cuts in the West (inclusive of Florida). This document is maintained within the company in electronic format, in a proprietary database that is not available to the public or disclosed outside of Verizon. Verizon employees that have access to this information are required to maintain this information as proprietary. This information is competitively sensitive information that reflects Verizon's business operations and its disclosure would be unfair to Verizon since it would permit Verizon's competitors to have free access to Verizon's internal business practices, while Verizon does not have access to comparable information from its competitors. Finally, the document constitutes "trade secret" information as that term is defined in Florida Statutes, Section 812.081 and thus falls within the definition of "proprietary confidential business information" as defined in Florida Statutes, Section 364.183(3). See FL Stat. Section 364.183(3)(a).</p>
<p>Attachment POD 7                  (Bates Nos. VZ 000010-VZ                  000278)</p>	<p>All documents</p>	<p>These documents are Verizon internal methods and procedures that describe Verizon's internal business practices for processing service requests for individual hot cuts, number portability, and bulk migrations from UNE-P to UNE-L.</p>

<p>Attachment POD 10 (Bates Nos. VZ 0000279 - VZ 000730)</p>	<p>All documents</p>	<p>These documents are maintained within the company in electronic format, in a proprietary database that is not available to the public or disclosed outside of Verizon. Verizon employees that have access to this information are required to maintain this information as proprietary. This information is competitively sensitive information that reflects Verizon's business operations and its disclosure would be unfair to Verizon since it would permit Verizon's competitors to have free access to Verizon's internal business practices, while Verizon does not have access to comparable information from its competitors. Finally, the documents constitute "trade secret" information as that term is defined in Florida Statutes, Section 812.081 and thus falls within the definition of "proprietary confidential business information" as defined in Florida Statutes, Section 364.183(3). See FL Stat. Section 364.183(3)(a).</p> <p>These documents are Verizon internal methods and procedures that describe Verizon's internal business practices for processing service requests for individual hot cuts, number portability, bulk migrations from UNE-P to UNE-L, multiple vendor orders. These documents are maintained within the company in electronic format, in a proprietary database that is not available to the public or disclosed outside of Verizon. Verizon employees that have access to this information are</p>
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		<p>required to maintain this information as proprietary. This information is competitively sensitive information that reflects Verizon's business operations and its disclosure would be unfair to Verizon since it would permit Verizon's competitors to have free access to Verizon's internal business practices, while Verizon does not have access to comparable information from its competitors. Finally, the documents constitute "trade secret" information as that term is defined in Florida Statutes, Section 812.081 and thus falls within the definition of "proprietary confidential business information" as defined in Florida Statutes, Section 364.183(3). See FL Stat. Section 364.183(3)(a).</p>
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DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment INT 4 (Bates Nos. VZ 985 - VZ 994 )	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.
Attachment INT 5 (Bates Nos. VZ 995 - VZ 996)	All highlighted text	
Attachment INT 9 (Bates Nos. VZ 1000 - VZ 1001)	All highlighted text	
Response to Interrogatory No. 14	All highlighted text	

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DOCUMENT	LINE(S)/COLUMN(S)	REASON
<p>Responses to MCI POD No. 1:</p> <p>Attachment INT 123 (1-6) (Bates Nos. VZ 1043 - VZ 1047)</p> <p>Attachment INT 123 (7) (Bates Nos. VZ 1048 - VZ 1051)</p>	<p>All highlighted text</p> <p>All highlighted text</p>	<p>This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.</p>

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
<p>Direct Testimony of William E. Taylor</p> <p>Page 21 Page 23 Page 36 Page 37 Page 38 Page 39 Page 40</p> <p>Exhibits</p> <p>Exhibit No. III-A Exhibit IV-A Exhibit IV-B Exhibit No. WET-III Exhibit No. WET IV Exhibit No. WET V Exhibit No. WET VI Exhibit No. WET VII</p>	<p>Lines 3-7 Line 21 Line 6 Lines 5, 8, 13, 15, 18 Lines 13, 16 Lines 3, 7, 14 Lines 8, 9</p> <p>All All All All All All All All</p>	<p>This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.</p>



EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Exhibit ODF-2 to the Direct Testimony of Orville D. Fulp	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.

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DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment INT 112 (Bates Nos. VZ 1127 - VZ 1135)	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.
Attachment POD 32 (Bates Nos. VZ 1138 - VZ 1139)	All highlighted text	

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Supplemental Response to INT 28	All highlighted text	This is competitively sensitive, confidential business information of Verizon that identifies the specific Verizon central offices that are manned versus those that are unmanned. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon and the ratepayers, by giving rise to significant security concerns. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.
Attachment INT 40a,e (Bates Nos. VZ 1053 - VZ 1060)	All highlighted text	
Attachment INT 61 (Bates Nos. VA 1061 - VZ 1062)	All highlighted text	
Attachment 1-INT 64c,d and 105 (Bates Nos. VZ 1063 - VZ 1073)	All highlighted text	
Attachment 2-INT 64c,d and 105 (Bates Nos. VA 1074 - VZ 1116)	All highlighted text	
Attachment 3-INT 64c,d and 105 (Bates No. VZ 1117 - diskette)	All highlighted text	
Attachment 88d,e (Bates Nos. VZ 1118 - VZ 1119)	All highlighted text	

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment INT 30(bb) (Bates Nos. VZ 1141 - VZ 1142)	All highlighted text	This is competitively sensitive, confidential business information that specifically identifies CLECs that maintain collocation facilities in Verizon central offices in Florida. Verizon maintains this information as confidential customer proprietary network information.
Attachment POD 20 (Bates Nos. VZ 1146 - VZ 1149)	All highlighted text	
Attachment POD 23-1 (Bates Nos. VZ 1167 - VZ 1176)	All highlighted text	
Attachment POD 23-2 (Bates Nos. VZ 1177 - VZ 1179)	All highlighted text	
Attachment POD 23-3 (Bates Nos. VZ 1180 - VZ 1181)	All highlighted text	
Attachment POD 24-1 - on CD (Bates No. VZ 1182)	All highlighted text	
Attachment POD 24-2 - on CD (Bates No. 1183)	All highlighted text	
Attachment POD 24-3 - on CD (Bates No. 1184)	All highlighted text	
Attachment POD 25a-1 - on CD (Bates No. VZ 1185)	All highlighted text	
Attachment POD 25a-2 - on CD (Bates No. VZ 1186)	All highlighted text	
Attachment POD 26 (Bates Nos. VZ 1189 - VZ 1190)	All highlighted text	
Attachment POD 29a-1 (Bates No. VZ 1191)	All highlighted text	
Attachment POD 29a-2 (Bates No. VZ 1192)	All highlighted text	
Attachment POD 29a-3 (Bates Nos. VZ 1193 - VZ 1194)	All highlighted text	

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment 1 to the Surrebuttal Testimony of Orville D. Fulp	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment INT 115 (Bates No. VZ 1195)	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Amended Exhibit III-A to the Direct Testimony of Verizon's Hot Cut Panel	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.

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ATTACHMENT L

Docket No. 030851-TP  
Verizon Florida Hot Cut Panel Direct Testimony  
Exhibit III-B  
Amendments to original filing  
February 17, 2004

The following amendments were made to the Verizon Florida Hot Cut Panel Direct Testimony filed on December 4, 2003:

- DBS Tab, Lines 9 & 16, 'Travel to Remote' changed from 7.94 to 7.31;
- DBS Tab, Line 10, 'Prewire Lines' changed from 5.01 to 9.02, which represents an 80% probability that 2 techs worked on the order;
- DBS Tab, Line 36, 'Create and Distribute Project Spreadsheet' changed from .32 to N/A;
- FCT Tab, 'Common Overhead' changed from .101574285 to .097074545
- LLR Tab, 'Directly Assigned' changed to 'Fully Assigned';
- LLR Tab, 2002 'RCCC' rate changed from \$37.07 to \$44.90;
- LLR Tab, 2002 'APC' rate changed from \$37.07 to \$32.85;
- LLR Tab, 2002 'RCMAC' rate changed from \$37.07 to \$44.90;
- LLR Tab, 2002 '211 Switching' rate changed from \$41.72 to \$51.25;
- LLR Tab, 2002 '202 I & R/Maint. Spicer' rate changed from \$41.72 to \$47.41;
- LLR Tab, 2002 '221 PBX Instal & Maint.' Rate changed from \$41.72 to \$58.08;
- LLR Tab, Average rate for 'Field Installation' changed from \$41.72 to \$52.75;
- COF-1..10 Tab, 'Travel to Remote Central Office' Probability of Occurrence changed from 100% to 8.88%;
- ORD-1..9 Tab, 'Project Spreadsheet Update/Input' changed from 13.20 to 0;
- FDS Tab, FDS in 'Source' column changed to 'FLD-1 & FLD-2'.

2/17/2004



EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment POD 31 (Bates No. VZ 1201)	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.
Attachment POD 32 (Bates No. VZ 1202)	All highlighted text	

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Verizon Hot Cut Panel Late-Filed Deposition Exhibit 2 Pages 2-5	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.