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June 8, 2001

Ms. Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
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RECEIVED-FPSC
01 JUN -8 AM 11:12
RECORDS AND
REPORTING

Re: Docket No. 990649-TP
Investigation into Pricing of Unbundled Network Elements

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order for certain information contained in its recurring and nonrecurring cost studies filed May 18, 2001. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (813) 483-2617.

Sincerely,

Kimberly Caswell
Kimberly Caswell

- APP _____
- CAF KC:tas
- CMP Enclosures
- COM
- CTR
- ECR
- LEG
- OPC
- PAI
- RGO
- SEC
- SER
- OTH *Marguerite*

This confidentiality request was filed by or for a "telco" for DN _____. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

06244-01 & 06246-01

RECEIVED & FILED

Max
FPSC-BUREAU OF RECORDS DOCUMENT NUMBER-DATE

07135 JUN-8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of)
Unbundled Network Elements) Docket No. 990649-TP

) Filed: June 8, 2001

**VERIZON FLORIDA INC.'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in its (1) recurring cost study and (2) nonrecurring cost study. The studies are contained on CDs filed May 18, 2001 in this proceeding.

All of the information for which Verizon seeks confidential treatment falls within Florida Statutes section 364.183(3)(e), which defines the term, "proprietary confidential business information," to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

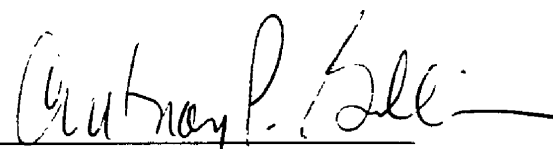
The confidential information concerns Verizon's costs of providing network elements and services, including third-party confidential data. If competitors are able to acquire this detailed and sensitive costing information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon. These competitors would be more adept at pricing their own services if they possess details about Verizon's cost structure. This affords them an unfair advantage while severely jeopardizing Verizon's competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer.

DOCUMENT NUMBER-DATE
07135 JUN-86
FPSC-REGULATORY REPORTING

While a ruling on this Request is pending, Verizon understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

A detailed justification of the confidentiality of the information at issue is attached hereto as Exhibit C. Tab designations are used to identify the location of the confidential files on the nonrecurring charge CD; .pdf designations are used to locate the confidential information on the recurring charge (ICM) CD.

Respectfully submitted on June 8, 2001.

By: 
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Telephone: 813/483-2617

Attorney for Verizon Florida Inc.

Verizon Florida Inc.
 List of Files and Redacted Files

Recurring Charge Study

	<u>FILE NAME</u>	<u>Redacted Files & Reason #</u>
<u>ICM SETUP</u>	ICM Model pdf	Reason 1, 2, 3, & 4
<u>READ FIRST</u>	Filing Overview pdf	
<u>STUDY RESULTS</u>	TELRIC Summary .pdf	
	BNF Summary.pdf	
<u>ICM MANUALS</u>		
<u>Model Methodology</u>	conceptualframeworkfl.PDF	
	loopfl.pdf	
	switchfl.pdf	
	interoffice modulefl.pdf	
	ss7modulefl.pdf	
	expmodulefl.pdf	
	mappingmodulefl.pdf	
<u>User Guide</u>	user_guidefl.PDF	

\System Manual\

sysman1tables.pdf

sysman2tables.pdf

\SUPPORTING DOCUMENTATION

\EXPENSE MODULE\

\Avoided Cost Study\

Avoided Cost Study.pdf

\Billing and Collection\

Billing and Collection.PDF

Reason # 5

\Directory Cost\

Directory Cost.PDF

Reason #5

\ICM Expense\

Section 1 pdf

Section 2.pdf

Section 3.pdf

Reason #5

Section 4.pdf

Reason #5

Section 5.pdf

Reason #5

Section 6.pdf

Reason #4

Section 7.pdf

Reason #1

Section 8.pdf

\IT DP\

FL - Itdp.pdf

Reason #5

\Service Assurance\

Service Assurance.pdf

Reason # 5

<u>\SM&A\</u>	SM&A Study.pdf	Reason # 5
<u>\LOOP MODULE \</u>		
<u>\Algorithms\</u>	Loopcode.pdf	
<u>\Material Support\</u>		
<u>\Material Cost Workpapers\</u>	FLmatl.pdf	Reason # 4
<u>\GTEAMS\</u>	Mat_gteams.pdf	Reason # 1
<u>\DLC Workpapers</u>		
	FLdlcww.pdf	Reason # 1
	FLdlcwr.pdf	Reason # 1
<u>\GTEAMS\</u>	DLC_gteams.pdf	Reason # 1
<u>\Placement Support\</u>		
<u>\Workpapers\</u>	FLnewibr.pdf	Reason # 1

		FLsspbid.pdf	Reason # 1
	<u>\Sources\</u>	SSP Contract DOCreasman.pdf	Reason # 1
		SSP Contract WMKristol.pdf	Reason # 1
		SSP ContractHenkelsMcCoy.pdf	Reason # 1
		SSP Contract Volt.pdf	Reason # 1
	<u>MISC. DOCUMENTATION\</u>		
	<u>\Labor Rates\</u>	Labor pdf	
	<u>\Map Text\</u>	Map to Text.pdf Maptxt4 exe	
	<u>\Material Loadings\</u>	Material Loading.pdf	
	<u>\Outboard Cost Studies\</u>		
	<u>\Dark Fiber\</u>	Dark Fiber.pdf	Reason #1 & #4
	<u>\Riser Cable</u>	FLintrabld.pdf	Reason #1
	<u>\HiCap - UNE\</u>		
		DS1 DS3 WC Cost.pdf	Reason # 4
	<u>\Sources\</u>	Fiber Terminals.pdf	Reason # 1
		Fiber Loop.pdf	Reason #1 & #4
	<u>\Source Code\</u>	Listing.pdf	
	<u>\RUN TIME OPTIONS\</u>		
	<u>\Distribution\</u>	OSP Distribution.pdf 3wr_drp3.pdf Drops and Terminals Inputs.pdf FLdfactor.pdf FLnefactor.pdf FLshare.pdf	Reason # 2 Reason # 2 Reason # 4
	<u>\Feeder\</u>	OSP Feeder.pdf GTEP 938-010-070.pdf GTEP 938-360-010.pdf GTEP 938-624-000.pdf PAR-074.pdf	

FLefactor.pdf Reason # 2

FLshare pdf Reason # 4

\Expense\

Expense User Options.pdf

\General\

OSP General.pdf

%Handig pdf

98ilhd&con pdf Reason # 4

Additional Investments for Manholes and Pull Boxes.pdf

anchorcalc.pdf Reason # 4

Conduit Flowchart.pdf

Conduit Trench.pdf

GTEP 911-400-071.pdf

guywire.pdf

lpidcalc.pdf

Material Cost of Concrete.pdf

Par-074.pdf

span lengthscu.PDF Reason # 4

span lengthsfi.PDF Reason # 4

Trenching and Plowing.pdf

\Interoffice\

IOT.pdf

lpidcalc.pdf

\SS7 MODULE\

\Algorithms\

SS7 Algorithms.pdf

\Network

Network Diagram.pdf

Parms.pdf

\SS7 Investment-Lease Support

Lease Support.pdf

Reason # 1

Loading Factors and Labor Rates.pdf

SS7inv.pdf

Reason # 1

\SWITCH MODULE\

\Algorithms\

Swalgo.pdf

\Costmod\

\Wholesale\

FL_gtd5w.pdf

Reason # 3

FL_gtd5r.pdf

Reason # 3

\Retail\

\SCIS\

\Wholesale\

FL 5ESS WHOLESAL ANALOG TRUNK REPORT.pdf

Reason # 3

FL 5ESS WHOLESAL FEATURE RUNS SET 1 (1ST HALF).pdf

Reason # 3

FL 5ESS WHOLESAL FEATURE RUNS SET 1 (2ND HALF).pdf

Reason # 3

FL 5ESS WHOLESAL FEATURE RUNS SET 2.pdf

Reason # 3

FL 5ESS WHOLESAL ISDN FEATURE REPORT.pdf

Reason # 3

FL 5ESS WHOLESAL MODEL OFFICE REPORT.pdf

Reason # 3

FL 5ESS WHOLESAL USAGE FEATURE REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL ANALOG ATTENDANT FEATURES.pdf

Reason # 3

FL DMS100 WHOLESAL ANALOG TRUNK REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL FEATURE RUNS SET 1.pdf

Reason # 3

FL DMS100 WHOLESAL FEATURE RUNS SET 2.pdf

Reason # 3

FL DMS100 WHOLESAL FEATURE RUNS SET 3.pdf

Reason # 3

FL DMS100 WHOLESAL ISDN FEATURE REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL MODEL OFFICE REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL USAGE FEATURE REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL TANDEM OFFICE REPORT.pdf

Reason # 3

FL DMS100 WHOLESAL TANDEM USAGE REPORT.pdf

Reason # 3

\Retail\

FL 5ESS RETAIL ANALOG TRUNK REPORT.pdf

Reason # 3

FL 5ESS RETAIL FEATURE RUNS SET 1 (1ST HALF).pdf

Reason # 3

FL 5ESS RETAIL FEATURE RUNS SET 1 (2ND HALF).pdf

Reason # 3

FL 5ESS RETAIL FEATURE RUNS SET 2.pdf

Reason # 3

FL 5ESS RETAIL ISDN FEATURE REPORT.pdf

Reason # 3

FL 5ESS RETAIL MODEL OFFICE REPORT.pdf

Reason # 3

FL 5ESS RETAIL USAGE FEATURE REPORT.pdf

Reason # 3

FL DMS100 RETAIL ANALOG ATTENDANT FEATURES.pdf

Reason # 3

FL DMS100 RETAIL ANALOG TRUNK REPORT.pdf

Reason # 3

FL DMS100 RETAIL FEATURE RUNS SET 1.pdf

Reason # 3

FL DMS100 RETAIL FEATURE RUNS SET 2.pdf

Reason # 3

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FL DMS100 RETAIL ISDN FEATURE REPORT.pdf

Reason # 3

FL DMS100 RETAIL MODEL OFFICE REPORT.pdf

Reason # 3

FL DMS100 RETAIL USAGE FEATURE REPORT.pdf

Reason # 3

FL DMS100 RETAIL TANDEM OFFICE REPORT.pdf

Reason # 3

FL DMS100 RETAIL TANDEM USAGE REPORT.pdf

Reason # 3

<u>\Sources\</u>		
<u>\Engineering Practices\</u>	Eng Practices.pdf	Reason # 1
<u>\EF&I\</u>	EF&I Overview.pdf FLefi.pdf	Reason # 1
<u>\Investment Adjust Factor\</u>	laf Overview.pdf FL_laf.pdf	Reason # 1 Reason # 2
<u>\Discounts\</u>	FL Discount.pdf SCIS Costmod Disc Dev.pdf	Reason # 1 Reason # 1
<u>\Vendor Quotes\</u>	VENDOR PDF	Reason # 1
<u>\Loop Test\</u>	FL Loop Test.pdf	Reason # 1
<u>\Source\</u>	Looptest_gteams.pdf	Reason # 1
<u>\Power\</u>	FL PWR.pdf Power Overview.pdf	Reason # 1
<u>\Processor Utilization Factor\</u>	PUFoverview.pdf puf.pdf	Reason # 2 & # 3
<u>\Switch Test\</u>	FL SW TST.pdf Mon_Test .pdf Source Documents.pdf	Reason # 1 & # 4 Reason # 1
<u>\TRANSPORT MODULE\</u>		
<u>\Algorithms\</u>	ICM-FL IOT Algorithm.PDF	
<u>\Overview\</u>	TRANSPORT.pdf	

VERIZON REDACTION REASONS RECURRING COST STUDY

1. The information contained in these files constitutes and is derived from code and/or algorithms and is based on proprietary and confidential information provided to Verizon by its third party vendors. Verizon's contractual obligations to those parties include the obligation not to disclose or distribute such proprietary or confidential Information. Aside from violating contract terms, disclosure of this information would harm Verizon's future ability to contract for goods and/or services on favorable terms.
2. This information details Verizon's second line information, residential and business line penetration and forecasted line growth. This detail consists of historical trends and future estimates. Cost information of this nature will give competitors an artificial competitive advantage in offering services where Verizon expects growth and to avoid offering competitive services in slower-growth areas.
3. This information is developed through the results of the SCIS and COSTMOD systems. The formulas are specific to each central office switch vendor and include information covered by proprietary agreements. Disclosure of these data would violate Verizon's contracts with its third party vendors and harm GTE's ability to continue negotiating favorable contract terms.
4. This information contains central office, and outside-plant specific data. Disclosure of this information gives competitors an unfair advantage in designing their networks and in competing against GTE in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.
5. This information contains the detailed cost components underlying discrete basic network functions. Disclosure of such detailed costs for such small pieces of the network would give competitors an advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

Verizon Florida Inc.
List of Files and Redacted Files

Nonrecurring Charge Study

			File Name	Reason for Redaction	
FL UNE (05-18-2001)	\Appendix\ \Tab 1 - Ordering\ \Tab 2 - Provisioning\ \Tab 3 - Field Installation\ \Tab 4 - OSS\ \Tab 5 - LLR\ \Tab 6 - Customized Routing\ \Custom Routing\ 		FL Wholesale Ordering Appendix.xls	2,4,5	
			UNE Appendix Advance.xls	2,4,5	
			UNE Appendix Exchange.xls	2,4,5	
			FW Calculations and Appendix.xls	2,4,5	
			OSS Appendix 1 Project Financial Detail.xls	2,3,4, 5	
			OSS Appendix 2 Project Descriptions.doc	1,3	
			OSS Appendix 3 Budget-Center Description.doc	1,3	
			Allr-1.xls	2	
			CR BFR Note.doc	n/a	Not Included
			CR BFR Note.doc	n/a	Not Included

Verizon Florida Inc.
List of Files and Redacted Files

Nonrecurring Charge Study


	File Name	Reason for Redaction	
\Field Work\ 	FL CO and Field Installation Summaries.xls	2,4,5	
	FL Fieldwork Narrative.doc	1	
\Ordering\ 	FL Wholesale Ordering.xls	2,4,5	
	FL Ordering Narr 2001.doc	1	
\OSS\ 	FL OSS Summary.xls	2,4,5	
	OSS Narr 2001.doc	1	
\Provisioning\ 	UNE Advance Provisioning.xls	2,4,5	
	UNE Exchange Provisioning.xls	2,4,5	
	UNE Provisioning (Combined).xls	2,4,5	
	Provisioning Narr 2001.doc	1	
\Summary\ 	Summary.xls	n/a	Not Redacted
	Summary Narr 2001.doc	n/a	Not Redacted

VERIZON REDACTION REASONS NONRECURRING COST STUDY

1. This information contains descriptions and details of business practices and processes Verizon uses to run its business. Disclosure of this information would give competitors an unfair advantage in assessing how best to structure their operations to compete with Verizon, without the usual marketplace trial and error. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.
2. This information contains loaded labor rates used by Verizon for specific job functions. Unilateral disclosure of these rates could adversely affect Verizon's ability to compete for talent in the marketplace.
3. This information contains the detailed cost components of various Operations Support Systems (OSS) used by Verizon. Disclosure of these detailed cost components would give competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient and effective manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.
4. This information details historical trends and future estimates. Cost information of this nature will give competitors an artificial competitive advantage in offering services where Verizon expects growth and to avoid offering competitive services in slower-growth areas.
5. This information contains the detailed cost components underlying discrete basic network functions. Disclosure of such detailed costs for such small pieces of the network would give competitors an advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in Docket No. 990649-TP were sent via U.S. mail on June 8, 2001 to the parties on the attached list.



or Kimberly Caswell

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