

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the Direct Testimonies of Larry Richter, Allen E. Sovereign, Bert I. Steele, Dennis B. Trimble, David G. Tucek and James H. Vander Weide on behalf of Verizon Florida Inc. in Docket No. 990649B-TP were sent via U. S. mail on November 7, 2001 to the parties on the attached list.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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|--------------------------------------|---|-------------------------|
| In re: Investigation into Pricing of |) | Docket No. 990649B-TP |
| Unbundled Network Elements |) | Filed: November 7, 2001 |
| _____ |) | |

**VERIZON FLORIDA INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Under Commission Rule 25-22.006, Verizon Florida Incorporated (Verizon) seeks confidential classification and a protective order for certain information contained in Exhibit DBT-3 to the Direct Testimony of Dennis B. Trimble in this proceeding. 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 highlighted, unredacted copy of the confidential material is attached to this request as Exhibit A. Redacted copies of the confidential material are attached as Exhibit B.

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 at issue reveals Verizon's wire-center-specific costs for 2-wire, 4-wire and DS-1 loops. This detailed information about Verizon's costs at a geographically disaggregated level will give Verizon's competitors an artificial advantage in fashioning their entry and expansion strategies in the most cost-effective manner. Disclosing wire-center-specific costs to Verizon's competitors would, for instance, allow them to know where Verizon might be most vulnerable to competition and what areas

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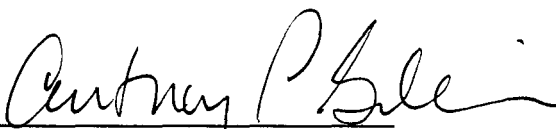
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might be unduly costly to serve. The information about wire center-specific line counts would, likewise, give competitors an artificial advantage in structuring their marketing plans to achieve the most successful market entry for the least cost.

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.

Respectfully submitted on November 7, 2001.

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