

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled)
network elements (Sprint/Verizon track))
_____)

Docket No. 990649B-TP
Filed: April 23, 2002

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 Supplemental Response to AT&T & MCI's First Set of Interrogatories (No. 32). The responses are contained on the attached confidential CD-ROM.

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."

Verizon's supplemental response to Interrogatory No. 32 contains exchange level detail on access line counts. The Commission typically protects such information from public disclosure. If competitors are able to acquire this detailed and sensitive information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon, and determine where Verizon might be most vulnerable to competition. This would afford them an unfair advantage while 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.

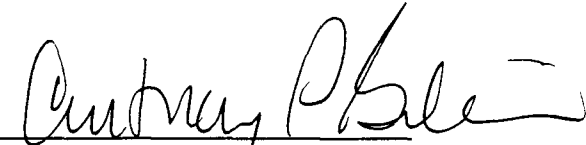
DOCUMENT NUMBER-DATE

04450 APR 23 8

FPSC-COMMISSION CLERK

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).

Respectfully submitted on April 23, 2002.

By: 
on Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813/483-2617

Attorney for Verizon Florida Inc.