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May 13, 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. 000075-TP (Phase IIA)  
Investigation into appropriate methods to compensate carriers for exchange of  
traffic subject to Section 251 of the Telecommunications Act of 1996

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental  
documentation for its Request for Confidential Classification in connection with its  
responses to Staff's First Request for Production of Documents (Nos. 4, 5, 6, 7) filed  
on April 18, 2002.

Highlighted and redacted copies (to include line numbering) of the responses to Nos.  
4, 5 and 7 are attached together with a redacted diskette which includes responses to  
No. 6 and supporting documentation for No. 7. A confidential diskette containing the  
responses to Nos. 6 and 7 was filed with the original Request on April 18, 2002. Also  
enclosed is a line-by-line justification (Exhibit C).

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

Sincerely,

*K. Caswell / tas*

Kimberly Caswell  
KC:tas  
Enclosures

c: Felicia Banks, Staff Counsel (w/e)

\* CCA note: Diskette  
forwarded to staff.

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Exhibit C  
Staff's First Request for Production of Documents  
Nos. 4, 5, 6 and 7

Page Nos.	Line(s)/Column(s)	Reason
P.2/POD No. 4	L15	The confidential highlighted number represents the average monthly intraLATA toll revenue per line in 1995.
P.2/POD No. 5	L21-22	The confidential highlighted numbers represent the average intraLATA toll revenue per line for customers presubscribed to Verizon in 1999, 2000 and 2001. The intraLATA market is intensely competitive, so information about a company's relative success in that market, measured by its revenues, would be valuable to another competitor in making market entry or expansion decisions.
POD No. 6a	Highlighted data in col. H, lines 13-66	The confidential highlighted numbers represent the local minutes of use billed to CLECs (CLEC to VZ). The intraLATA market is intensely competitive, so information about a company's relative success in that market, as measured by terminating local minutes of traffic, would be valuable to another competitor in making market entry or expansion decisions. Even though the CLECs are not identified by name, a knowledgeable person could deduce which MOUs belong to which CLECs by their relative weighting.
POD No. 6b	Highlighted data in columns E, F, G and I, lines 7-156	The information in Cols. E, F, G, and I reveals CLEC billing account numbers, number of calls, raw MOU data, and percent local usage MOUs by CLEC. The intraLATA market is intensely competitive, so information about a company's relative success in that market, measured by the call volume or MOU, for example, would be valuable to another competitor in making market entry or expansion decisions.
POD No. 6c	Highlighted data in columns B - E, lines 12, 20, 28, 36, 45, 53, 61, 69, 77, 85	The highlighted data represents billed local minutes of use (VZ to CLEC) for the first three months of 2001. The intraLATA market is intensely competitive, so information about a company's relative success in that market, as measured by terminating local minutes of traffic, would be valuable to another competitor in making market entry or expansion decisions. Even though the CLECs are not identified by name, a knowledgeable person could deduce which MOUs belong to which CLECs by their relative weighting.
POD No. 6d	Highlighted data in columns B - E, lines 7, 9, 11, 13, 15, 17, 19, 21, 23, 25	The highlighted data represents billed local minutes of use (col. B: VZ to CLEC, col. C: CLEC to VZ) and the local MOU ratio (col. D). Col. E contains explanatory notes about the data in col. D. The intraLATA market is intensely competitive, so information about a company's relative success in

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		that market, as measured by terminating local minutes of traffic, would be valuable to another competitor in making market entry or expansion decisions. Even though the CLECs are not identified by name, a knowledgeable person could deduce which MOUs belong to which CLECs by their relative weighting.
POD No. 6e	<p>Report 1 of 4: Highlighted data in columns E - Y, lines 10-90</p> <p>Columns H - V, lines 10-63</p> <p>Report 2 of 4: Highlighted data in columns E, F, G, and I, Lines 4-153</p> <p>Report 3 of 4: Columns B - E, Lines 6-24</p> <p>Report 4 of 4: Columns B - E, Lines 11, 19, 27, 35, 44, 52, 60, 68, 76, 84</p>	<p>The confidential highlighted numbers represent the raw intraLATA MOU, calculated local MOU billed to CLECs (CLEC to VZ), and local revenue data. The intraLATA market is intensely competitive, so information about a company's relative success in that market would be valuable to another competitor in making market entry or expansion decisions. Even though the CLECs are not identified by name, a knowledgeable person could deduce which MOUs belong to which CLECs by their relative weighting.</p> <p>See explanation for POD 6b.</p> <p>See explanation for POD 6c.</p> <p>See explanation for POD 6d.</p>
P. 3/POD No. 7	Lines 18 and 21	The confidential highlighted amount on Line 18 represents an estimate of the revenue impact to Verizon Florida of converting all intraLATA intercarrier traffic in Florida to reciprocal compensation. The confidential highlighted amount on Line 21 represents an estimate of converting all CLEC-originated intraLATA intercarrier traffic to reciprocal compensation.
POD No. 7 (Diskette)	L 9, 11 and 13; col. C-J	The highlighted data in columns C-J of the diskette provides the workpapers that support the estimates provided in the response to POD No. 7. The intraLATA market is intensely competitive, so information about a company's relative success in that market, measured by its revenues, would be valuable to another competitor in making market entry or expansion decisions.