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Richard Chapkis
Vice President & General Counsel, Southeast Region
Legal Department

FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 273-9825
richard.chapkis@verizon.com

April 10, 2003

Ms. Blanca S. Bayo, Director
Division of Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED-FPSC
03 APR 10 AM 10:56
COMMISSION
CLERK

Re: Docket No. 981834-TP
Petition of Competitive Carriers for Commission Action to Support Local
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP
Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic
investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida,
Incorporated, and GTE Florida Incorporated comply with obligation to provide
alternative local exchange carriers with flexible, timely, and cost-efficient
physical collocation

Dear Ms. Bayo:

Please find enclosed an original and fifteen copies of Verizon Florida Inc.'s Request
for Confidential Classification and Motion for Protective Order in connection with
Verizon's responses to Staff's Fourth Request for Production of Documents in the
above matters. Service has been made as indicated on the Certificate of Service. If
there are any questions regarding this filing, please contact me at 813-483-1256.

Sincerely,

Richard A. Chapkis

Richard Chapkis

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FPSC-BUREAU OF RECORDS

RC:tas
Enclosures

REQUEST
DOCUMENT NUMBER-DATE

03346 APR 10 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission) Docket No. 981834-TP
Action to Support Local Competition in BellSouth) Filed: April 10, 2003
Telecommunications Inc.'s Service Territory)
_____)
Petition of ACI Corp. d/b/a Accelerated Connections,) Docket No. 990321-TP
Inc. for generic investigation to ensure that BellSouth)
Telecommunications, Inc., Sprint-Florida,)
Incorporated, and GTE Florida Incorporated comply)
with obligation to provide alternative local exchange)
carriers with flexible, timely, and cost-efficient)
physical collocation)
_____)

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 responses to Staff's Fourth Request for Production of Documents (specifically POD Nos. 38(a), 41, 41(a)(1)-(12) and 44) filed in this matter.

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." If competitors were 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. This would afford 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

DOCUMENT NUMBER DATE

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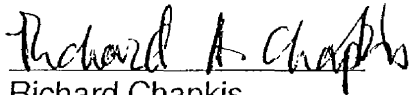
FPSC-COMMISSION CLERK

ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer.

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).

One highlighted copy of the confidential information is provided on the attached proprietary CD as Exhibit A. A redacted copy is provided on the attached CD as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on April 10, 2003.

By: 
Richard Chapkis
P. O. Box 110, FLTC0717
Tampa, FL 33602
(813) 483-1256

Attorney for Verizon Florida Inc.

EXHIBIT C

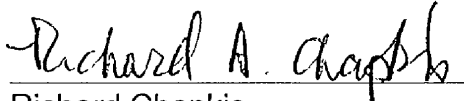
PAGE NOS.	LINE(S)/COLUMN(S)	REASON
POD No. 38(a): 313, 314, 316, 319, 320, 321, 322, 323	All highlighted text	<p>This information contains the detailed cost components underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design 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.</p>
POD No. 41: 324	All highlighted text	<p>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 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.</p>
POD No. 41(a)(1)-(12): 325-347	All highlighted text	<p>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 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.</p>
POD No. 44 365, 366	All highlighted text	<p>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 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.</p>

VERIZON REDACTION REASONS
DOCKET NOS. 981834-TP/990321-TP

1. The information contained in these files constitutes and is derived from algorithms and/or contractual prices provided to Verizon from 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 is derived from Verizon employee salary and labor rates. 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 underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design 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.
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 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 Nos. 981834-TP and 990321-TP were sent via electronic mail and U.S. mail on April 10, 2003 to the parties on the attached list.


Richard Chapkis

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy Sims
BellSouth Telecomm. Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St NW, Suite 800
Washington, DC 20005-2004

Richard D. Melson
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Virginia C. Tate/Lisa A. Riley
AT&T
1200 Peachtree Street N.E.
Suite 8066
Atlanta, GA 30309-3523

Norton Cutler
Development Specialists Inc.
c/o Steve Victor
70 West Madison Street
Suite 2300
Chicago, IL 60602-4250

Peter M. Dunbar
Barbara Auger
Pennington Law Firm
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

Catherine Ronis
Daniel McCuaig
Jonathan Frankel
Wilmer Cutler & Pickering
2445 M Street N.W.
Washington, DC 20037-1420

Nanette S. Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802-4343

Kenneth Hoffman
Rutledge Law Firm
215 S. Monroe St., Suite 420
Tallahassee, FL 32302

Andrew Isar
Telecomm. Resellers Assn.
c/o Miller Isar, Inc.
7901 Skansie Ave., Suite 240
Gig Harbor, WA 98335

Terry Monroe/Genevieve Morelli
CompTel
1900 M Street N.W.
Suite 800
Washington, DC 20036

Michael A. Gross
Florida Cable Telecomm. Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Vicki Kaufman/Joe McGlothlin
McWhirter Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

David Tobin
Fla. Public Telecomm. Assn.
c/o Tobin & Reyes
7251 W. Palmetto Park Road
#205
Boca Raton, FL 33433-3487

John D. McLaughlin, Jr.
KMC Telecom Inc.
1755 North Brown Road
Lawrenceville, GA 30043-8119

Deborah Eversole
General Counsel
Kentucky Public Service Comm.
P. O. Box 615
Frankfort, KY 40602

Donna McNulty
MCI WorldCom
1203 Governors Square Blvd.
Suite 201
Tallahassee, FL 32301-2960

Floyd R. Self/Tracy Hatch
Messer Law Firm
P. O. Box 1876
Tallahassee, FL 32302

David Woodsmall
Mpower Comm. Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534-4558

Mark E. Buechele
Supra Telecommunications
2620 SW 27th Avenue
Miami, FL 33133

Laura L. Gallagher
MediaOne Florida Tele.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301

Don Sussman
Network Access Solutions Corp.
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

William H. Weber
Covad Communications Co.
1230 Peachtree Street N.E.
19th Floor
Atlanta, GA 30309-3574

S. Masterton/C. Rehwinkel
Sprint-Florida Incorporated
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069

Betty Willis
ALLTEL Communications
Services Inc.
One Allied Drive
Little Rock, AR 72203

J. Jeffry Wahlen
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32302

Anu Seam
U.S. Department of Justice
Telecom Task Force
Antitrust Division
1401 H Street N.W., Suite 8000
Washington, DC 20530

Brent McMahan
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501
Orlando, FL 32801

Matthew Feil
Florida Digital Network Inc.
390 N. Orange Avenue
Suite 2000