

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)
_____)

Docket No. 030867-TL
Filed: August 27, 2003

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 the Direct Testimony of Orville D. Fulp, Exhibits ODF-1, ODF-2, ODF-3 and Exhibit ETL-1 attached to the Direct Testimony of Evan T. Leo 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 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

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will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

One highlighted copy of the confidential information is attached to the original of this Request as Exhibit A. Two redacted copies are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on August 27, 2003.

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EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Exhibit No. ETL-1, pages 2 and 6	All highlighted text	This is aggregate data on facilities-based lines that come from the E911 databases maintained by Verizon. Although these data do not reveal any customer proprietary information and, therefore, are not required to be marked as confidential, Verizon has designated it as confidential out of an abundance of caution to stave off claims that the unredacted use of this data is somehow improper.
Direct Testimony of Orville D. Fulp Pages 12, 22, 23, 24	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.
Exhibit No. ODF-1 (6 pages)	All highlighted text	
Exhibit No. ODF-2 (5 pages)	All highlighted text	
Exhibit ODF-3 (7 pages)	All highlighted text	