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October 27, 2003

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. 030867-TL

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

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in connection with the Company's supplemental responses to Citizens' First Set of Requests for Production of Documents (specifically, nos. 16, 18, 19) in the above matter. 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.

RECEIVED & FILED Sincerely, Richard M. Chaples **AUS** CAF Richard Chapkis CMP COM RC:tas CTR **Enclosures** ECR GCL OPC **MMS** SEC

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

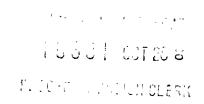
Docket No. 030867-TL Filed: October 27, 2003

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 its supplemental responses to Citizens' First Set of Requests for Production of Documents (specifically, Nos. 16, 18, 19) 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



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 October 27, 2003.

By:

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Tampa, FL 33602
(813) 483-1256

Attorney for Verizon Florida Inc.

Richard M. Chaples

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment POD 16	All highlighted text	This is competitively sensitive,
(Bates Nos. 300-304)		confidential and proprietary
		business information that has
Attachment POD 18		been confidentially maintained by
(Bates Nos. 305-316)		Verizon. Disclosure of this information would cause harm to
Attachment POD 19		Verizon by giving its competitors
(Bates Nos. 317-327)		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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in Docket No. 030867-TL were sent via electronic mail and overnight delivery on October 27, 2003 to:

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