JAMES E. "JIM" KING, JR.

PRESIDENT



Charles J. Beck Interim Public Counsel

ORIGINAL

STATE OF FLORIDA OFFICE OF THE PUBLIC COUNSEL

> c/o the florida legislature 111 west madison st. room 812 tallahassee, florida 32399-1400 850-488-9330

> > November 17, 2003

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0870 COMMISSION

JOHNNIE BYRD

Speaker

RE: Docket No. 030867-TL

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of Supplement to Citizens' November 10, 2003 Notice of Intent to use Confidential Information and Request for Ruling on Confidentiality for filing in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

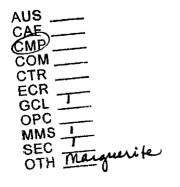
RECEIVED & FILED

Sincerely,

Charles J. Beck ' Interim Public Counsel

CJB/dsb

Enclosures



DOCUMENT NUMBER-DATE 11542 NOV 178 FPSC-COMMISSION CLEFT

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Verizon Florida Inc.) to reform intrastate network access) and basic local telecommunications) rates in accordance with Section) 364.164, Florida Statutes.	Docket No. 030867-TL
In re: Petition by Sprint-Florida,) Incorprated to reduce intrastate) switched network access rates) to interstate parity in revenue-neutral) manner pursuant to Section 364.164(1),) Florida Statutes.	Docket No. 030868-TL
In re: Petition for implementation of) Section 364.164, Florida Statues, by) rebalancing rates in a revenue-neutral) manner through decreases in intrastate) switched access charges with offsetting)	Docket No. 030869-TL
rate adjustments for basic services, by) BellSouth Telecommunications, Inc.)	Filed November 17, 2003

SUPPLEMENT TO CITIZENS' NOVEMBER 10, 2003 NOTICE OF INTENT TO USE CONFIDENTIAL INFORMATION AND REQUEST FOR RULING ON <u>CONFIDENTIALITY</u>

The Citizens of Florida file this supplement to the Notice of Intent to Use Confidential Information and Request for Ruling on Confidentiality filed on November 10, 2003, and state the following.

1. On November 10, 2003, Citizens filed a notice of intent to use five pages of documents provided by Verizon Florida, Inc. (Verizon) in response to discovery requests. Citizens believe that Verizon intends to rely on their request for confidential classification and motion for protective order filed on October 28, 2003, in order to prevent public disclosure of the important information contained in these documents.

DECEMENT NUMBER-DATE

FPSC-COHMISSION CLERK

11542 NOY 178

2. Verizon's request for confidential classification and motion for protective order is wholly inadequate as a basis to prohibit public disclosure of the information contained in these documents. Verizon simply provides a boilerplate conclusion that information on almost two hundred pages of documents is confidential. It makes no attempt to show *why* the specific information contained in the five pages cited in Citizens' notice of intent is confidential. Instead, Verizon only makes a general claim that could be applied to almost any information it supplies.

3. The information contained in these five pages of documents discloses essential information about the anticipated impact of Verizon's petition on customers' bills. Verizon had this information prior to filing its petition, yet it failed to disclose it to the public. The information contained in these documents should be disclosed to the public, and Verizon has not substantiated its claim for confidentiality. Citizens accordingly request the Prehearing Officer to rule that the information contained on these five pages of documents should be disclosed to the public.

Respectfully submitted.

Charles J. Beck J Interim Public Counsel

Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 Attorney for the Citizens of the State of Florida

DOCKET NOS. 030869-TL, 030868-TL and 030867-TL and 030961-TI CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Supplement to Citizens' November 10, 2003 Notice of Intent to Use Confidential Information and Request for Ruling on Confidentiality has been furnished by U.S. Mail, hand-delivery and/or overnight delivery to the following parties on this 17th day of November, 2003.

Beth Keating, Esquire Division of Legal Services Fla. Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

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