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November 19, 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

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Re: Docket No. 030867-TL Amended 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:

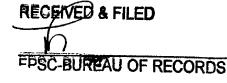
Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in connection with the Rebuttal Testimonies of Carl R. Danner and Evan T. Leo in the above matter. Service has been made as indicated on the Certificate of Service. If there are any guestions regarding this matter, please contact me at 813-483-1256.

Sincerely,

Richard N. Chaples

Richard A. Chapkis

RAC:tas Enclosures



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DOCUMENT NUMBER - PATE

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FPSC-COMMISSION CLULT

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: November 19, 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 Rebuttal Testimonies of Carl R. Danner and 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

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 November 19, 2003.

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By:

Richard M. Chaples

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

Attorney for Verizon Florida Inc.

EXHIBIT C

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DOCUMENT	LINE(S)/COLUMN(S)	REASON
Rebuttal Testimony of	All highlighted text	This is competitively sensitive,
Carl R. Danner		confidential and proprietary
Page 42	Lines 23-25	business information that has
Page 43	Lines 1-5	been confidentially maintained by
		Verizon. Disclosure of this
		information would cause harm to
Rebuttal Testimony of Evan T. Leo	Lines 1 and 6	Verizon by giving its competitors
Page 2		an unfair advantage in developing, pricing and marketing their
Faye 2		services. It would be particularly
		unfair to disclose this information
		because similar information about
		competitive carriers is not made
		available to the public.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and overnight delivery on November 19, 2003 to:

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

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

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