## ORIGINAL



Richard A. 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

AM IO:

 $\leq l$ 

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

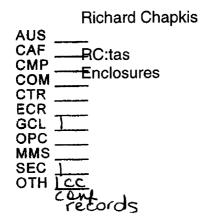
Re: Docket No. 030867-TL Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic Local Telecommunications Rates in Accordance with Florida Statutes, Section 364.164

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 response to Staff's First Set of Interrogatories (No. 25) in the above matter. Service has been made as indicated on the Certificate of Service. DISTRIBUTION CENTER If there are any questions regarding this filing, please contact me at 813-483-1256.  $\breve{\omega}$ 3 NOV 20 NN 10: 04

Sincerely,

Richard N. Chaples



RECEIVED & FILED **PSC-BUREAU OF RECORDS** 

DOCUMENT NI MOER DATE 11727 NOV 20 8

FPSC-COMMISSION CLERK

## 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, F.A.C., Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in the company's supplemental response to Staff's First Set of Interrogatories (No. 25) in this proceeding.

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.

I T Z Z HOV 20 S

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.

Richard A. Chaples

By:

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

Attorney for Verizon Florida Inc.

## EXHIBIT C

.

, **`** 

.

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Supplemental Response to	All highlighted text	This is competitively sensitive,
Interrogatory No. 25		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.

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 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

> Tracy Hatch AT&T 101 N. Monroe, Suite 700 Tallahassee, FL 32301

Michael Gross Florida Cable Telecomm. Assn. 246 East 6<sup>th</sup> Avenue Tallahassee, FL 32303

> Susan Masterton Charles Rehwinkel Sprint-Florida 1313 Blairstone Road MC FLTLHO0107 Tallahassee, FL 32301

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

Charles J. Beck H. F. Mann Office of Public Counsel 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 John Fons Ausley & McMullen, P.A. 227 South Calhoun Street Tallahassee, FL 32302

. . . .

Michael B. Twomey AARP 8903 Crawfordsville Road Tallahassee, FL 32305

Mark Cooper AARP 504 Highgate Terrace Silver Spring, MD 20904

De O'Roark MCI 6 Concourse Parkway Suite 600 Atlanta, GA 30328

George Meros Gray Harris & Robinson 301 S. Bronough Street Suite 600 Tallahassee, FL 32301

Floyd Self Messer Law Firm 215 S. Monroe Street Suite 701 Tallahassee, FL 32301

John Feehan Knology, Inc. 1241 O.G. Skinner Drive West Point, GA 31833

Richard A. Chaples

**Richard Chapkis**