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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

November 24, 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. 030746-TP
Complaint of Cargill Crop Nutrition, Inc. against Verizon Florida Inc. for
enforcement of Order PSC-97-0385-FOF-TL to eliminate application and
associated charges of Verizon General Service Tariff 113.2, and request for relief

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 response to Staff's First Request for Production of Documents (No.
1) 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.

Sincerely,

Richard A. Chapkis

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FPSC-BUREAU OF RECORDS

Richard Chapkis

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Cargill Crop Nutrition, Inc.)
against Verizon Florida Inc. for enforcement)
of Order PSC-97-0385-FOF-TL to eliminate)
application and associated charges of)
Verizon General Service Tariff 113.2,)
and request for relief)
_____)

Docket No. 030746-TP
Filed: November 24, 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 response to Staff's First Request for Production of Documents (No. 1) 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.

DOCUMENT NUMBER-DATE

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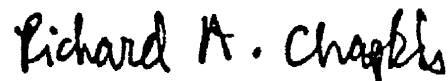
FPSC-COMMISSION CLERK

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 24, 2003.

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
Response to POD No. 1 Bates Nos. 1-29	All highlighted text	This is confidential and proprietary subscriber information. All records supplied by a telecommunications company, as defined by s. 364.02, to a state or local government agency which contain the name, address and telephone number of subscribers are confidential and exempt from the provisions of subsection (1) and s. 24(a), Art. 1 of the State Constitution.
Response to POD No. 1 Bates Nos. 30-33	All highlighted text	These documents are cable schematics. For national security reasons, they are considered proprietary and confidential.

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. 030746-TP were sent via overnight delivery(*) on November 21, 2003 and U.S. mail(**) on November 24, 2003 to the parties listed below:

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

Greg Lefor, Controller(**)
Cargill Phosphate Production
8813 Highway 41 South
Riverview, FL 33569

Raymond W. Smith(**)
Williams Management Services & Associates
821 South Orleans
Tampa, FL 33606

R. Vernon Williams(**)
Williams Management Services
1413 Emerald Creek Drive
Valrico, FL 33594

Stephen Murray(**)
IT Infrastructure Manager
Cargill Crop Nutrition
8813 Highway 41 South
Riverview, FL 33569

Richard A. Chapkis

Richard Chapkis