

ORIGINAL



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December 22, 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

RECEIVED - FPSC  
03 DEC 22 AM 10:55  
COMMISSION  
CLERK

Re: Docket No. 030852-TP  
Implementation of requirements arising from Federal Communications  
Commission's triennial UNE Review: Location-Specific Review for DS1, DS3  
and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber  
Transport

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s  
Request for Confidential Classification in connection with Exhibits B and C to the Joint  
Direct Testimony of Orville D. Fulp and John White in the above matter. Service has  
been made as indicated on the Certificate of Service. If there are any questions  
regarding this matter, please contact me at 813-483-1256.

Sincerely,

*Richard A. Chapkis*

Richard A. Chapkis

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FPSC-BUREAU OF RECORDS

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Enclosures

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This confidentiality request was filed by or  
for a "telco" for DN 13265-03. No ruling  
is required unless the material is subject to a  
request per 119.07, FS, or is admitted in the  
record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE

13264 DEC 22 03

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising )  
from Federal Communications Commission's )  
triennial UNE Review: Location-Specific )  
Review for DS1, DS3, and Dark Fiber Loops )  
and Route-Specific Review for DS1, DS3 and )  
Dark Fiber Transport )  
\_\_\_\_\_ )  
 )

Docket No. 030852-TP  
Filed: December 22, 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 Exhibits B and C to the Joint Direct Testimony of Orville D. Fulp and John White 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.

DOCUMENT ACCEPTED

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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 December 22, 2003.

By: Richard A. Chapkis  
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Attorney for Verizon Florida Inc.

**EXHIBIT C**

<b>DOCUMENT</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
Exhibits B and C to the Joint Direct Testimony of Orville D. Fulp and John White	All highlighted text	This is competitively sensitive, 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.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail  
and U.S. mail on December 22, 2003 to:

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