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January 23, 2001

Ms. Blanca S. Bayo, Director Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re:

Docket No. 990362-TI

Initiation of Show Cause Proceeding Against GTE Communications Corporation for Apparent Violation of Rule 25-4.118, F.A.C., Local, Local Toll, or Toll Provider Selection

Dear Ms. Bayo:

Please find enclosed for filing an original and fifteen copies of Verizon Select Services Inc.'s Amended Request for Temporary Protective Order 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 813-483-2617.

Sincerely,

pm Kimberly Caswell

KC:tas Enclosures

Fordham

FPSC-BUMEAU OF RECORDS

DOCUMENT NUMBER-DATE

00986 JAN 23 5

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause Proceeding against GTE Communications Corporation for Apparent Violation of Rule 25-4.118, F.A.C., Local, Local Toll, or Toll Provider)))	Docket No. 990362-TI Filed: January 23, 2001
Selection)	
	.)	

VERIZON SELECT SERVICES INC.'S AMENDED REQUEST FOR TEMPORARY PROTECTIVE ORDER

On December 18, 2000, pursuant to Commission Rule 25-22.006(6)(c), Verizon Select Services Inc. (VSSI) (formerly GTE Communications Corporation) submitted a Request for Temporary Protective Order (Request) covering certain VSSI-confidential information filed with the Commission by the Office of Public Counsel (OPC). On January 3, 2001, OPC filed a Response and Objection to VSSI's Request for a Temporary Protective Order (Response and Objection). With that filing, OPC asked the Commission to deny VSSI's request for a temporary protective order and instead require VSSI to submit a specific request for protective order before the hearing. In its Request, VSSI had noted that under Commission Rule 25-22.006(8)(b) and the interpretation of that rule rendered in Order number PSC-00-1140-PCO-TL (00 FPSC 6:312, June 23, 2000), VSSI is not required to submit a specific request until after the confidential information at issue is admitted into the evidentiary record.

VSSI has not changed its position as to the meaning of Rule 25-22.006(8)(b). However, in the spirit of compromise, VSSI has agreed with OPC that it will submit a specific request for confidential protection of the materials at issue by February 2, 2001. VSSI emphasizes that this compromise is made only for purposes of this case, and should not be construed as precedential for any other case.

DOCUMENT NUMBER - DATE

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In light of this compromise, VSSI has agreed to amend its original, December 18

Request and submit this Amended Request. VSSI understands that OPC will now

withdraw its Response and Objection.

This Amended Request covers the same items as the original request: (1) the

deposition of Larry Commons and an accompanying confidential exhibit, filed by OPC

on December 8, 2000; and (2) the testimony and exhibit of R. Earl Poucher, filed by

OPC on December 15, 2000. OPC filed all of these documents under confidential

cover.

The documents covered by this Amended Request fall 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 that information." In a

competitive business, any such knowledge about a competitor can be used to the

detriment of the entity to which it pertains. This unfair advantage skews the operation of

the market, to the ultimate detriment of the consumer.

VSSI is filing this Request to ensure that its confidential information remains

protected from public disclosure and exempted from section 119.07(1) of the Florida

Statutes.

Respectfully submitted on January 23, 2001.

Kimberly Caswell

Post Office Box 110, FLTC0007

Tampa, Florida 33601

Telephone: 813-483-2617

Attorney for Verizon Select Services Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of Verizon Select Services Inc.'s Amended Request for Temporary Protective Order in Docket No. 990362-TI were sent via overnight delivery(*) on January 22, 2001 and U.S. mail(**) on January 23, 2001 to:

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

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Bun Kimberly Caswell (