

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of)
Unbundled Network Elements)
_____)

Docket No. 990649B-TP
Filed: November 7, 2001

VERIZON FLORIDA INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Under Commission Rule 25-22.006, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in its responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, and 67) in this proceeding. 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). A highlighted, unredacted copy of the confidential material is attached to the original of this request as Exhibit A. Redacted copies of the confidential material are attached as Exhibit B.

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."

Interrogatory responses 1, 2, 14, 15, 20, and 21 contain highly confidential competitive and strategic information. Disclosure of Verizon's competitive loss data and business plans would give competitors an unfair advantage by enabling them to target where to compete against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this strategic planning information.

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Interrogatory responses 12, 54, 55, 66, and 67 contain central office, and outside-plant specific data. Disclosure of this information gives competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient manner.

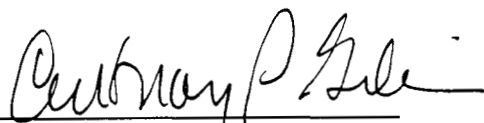
The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

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.

Respectfully submitted on November 7, 2001.

By:

gc



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