

Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department



FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-2606
Fax 813 204-8870
kimberly.caswell@verizon.com

November 28, 2001

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

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COMMISSION
CLERK

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements

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 for certain information contained in its recurring and nonrecurring cost studies filed November 7, 2001 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 813-483-2617.

Sincerely,

Kimberly Caswell

Kim

KC:tas
Enclosures

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DOCUMENT NUMBER-DATE
14963 NOV 28 2001
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649B-TP
Filed: November 28, 2001

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 its (1) recurring cost study and (2) nonrecurring cost study. The studies are contained on CDs filed November 7, 2001 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."

The confidential information concerns Verizon's costs of providing network elements and services, including third-party confidential data. If competitors are able to acquire this detailed and sensitive costing information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon.

These competitors would be more adept at pricing their own services if they possess details about Verizon's cost structure. This affords 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

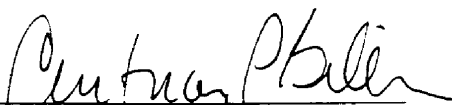
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FPGC-COMMISSION CLERK

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).

A detailed justification of the confidentiality of the information at issue is attached hereto as Exhibit C. Tab designations are used to identify the location of the confidential files on the nonrecurring charge CD; .pdf designations are used to locate the confidential information on the recurring charge (ICM) CD.

Respectfully submitted on November 28, 2001.

By: 
Kimberly Caswell
Post Office Box 110, FLTC0007
Tampa, FL 33601
Telephone: 813/483-2617

Attorney for Verizon Florida Inc.

GENERAL INDEX - PROPRIETARY
Verizon Florida Inc.

FILE NAME

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\ICM Setup\

SETUP EXE
SETUP.INI
SETUP.INS
SETUP ISS
SETUP PKG
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INST32I.EX
_ISDEL EXE
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_SETUP LIB

\READ FIRST\

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\STUDY RESULTS\

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\Model Methodology\

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FILE NAME **Redacted Files**
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expmodulefl.pdf

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\User Guide\

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SUPPORTING DOCUMENTATION

\EXPENSE MODULE\

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\TRANSPORT MODULE\

\Algorithms\

\Overview\

Source Documents pdf

Reason # 1

ICM-FL IOT Algorithm PDF

TRANSPORT pdf

VERIZON REDACTION REASONS RECURRING COST STUDY

1. The information contained in these files constitutes and is derived from code and/or algorithms and is based on proprietary and confidential information provided to Verizon by its third party vendors. Verizon's contractual obligations to those parties include the obligation not to disclose or distribute such proprietary or confidential information. Aside from violating contract terms, disclosure of this information would harm Verizon's future ability to contract for goods and/or services on favorable terms.
2. This information details Verizon's second line information, residential and business line penetration and forecasted line growth. This detail consists of historical trends and future estimates. Cost information of this nature will give competitors an artificial competitive advantage in offering services where Verizon expects growth and to avoid offering competitive services in slower-growth areas.
3. This information is developed through the results of the SCIS and COSTMOD systems. The formulas are specific to each central office switch vendor and include information covered by proprietary agreements. Disclosure of these data would violate Verizon's contracts with its third party vendors and harm Verizon's ability to continue negotiating favorable contract terms.
4. This information contains 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.
5. This information contains the detailed cost components underlying discrete basic network functions. Disclosure of such detailed costs for such small pieces of the network would give competitors an 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.

Non-recurring Cost Study

Verizon Florida Inc.
List of Files and Redacted Files

File Name	Reason for Redaction
FL UNE (11-07-2001) \Appendix\ \Tab 1 - Ordering\ \Tab 2 - Provisioning\ \Tab 3 - Field Installation\ \Tab 4 - OSS\ \Tab 5 - LLR\ \Tab 6 - Customized Routing\ \Custom Routing\ FL Wholesale Ordering Appendix.xls UNE Appendix Advance.xls UNE Appendix Exchange.xls FW Calculations and Appendix.xls OSS Appendix 1 Project Financial Detail.xls Allr-1.xls CR BFR Note.doc CR BFR Note.doc	5 5 5 4,5 5 5 n/a n/a

Not Included
Not Included

Verizon Florida Inc.
List of Files and Redacted Files

Non-recurring Cost Study


	File Name	Reason for Redaction
\Field Work\	FL CO and Field Installation Summaries.xls	4,5
	FL Fieldwork Narrative.doc	n/a Not Redacted
\Ordering\	FL Wholesale Ordering.xls	5
	FL Ordering Narr 2001.doc	n/a Not Redacted
\OSS\	FL OSS Summary.xls	5
	FL OSS Note	n/a Not Redacted
\Provisioning\	UNE Advance Provisioning.xls	5
	UNE Exchange Provisioning.xls	5
	UNE Provisioning (Combined).xls	5
	Provisioning Narr 2001.doc	n/a Not Redacted
\Summary\	Summary.xls	n/a Not Redacted
	Summary Narr 2001.doc	n/a Not Redacted

VERIZON REDACTION REASONS NONRECURRING COST STUDY

1. This information contains descriptions and details of business practices and processes Verizon uses to run its business. Disclosure of this information would give competitors an unfair advantage in assessing how best to structure their operations to compete with Verizon, without the usual marketplace trial and error. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.
2. This information contains loaded labor rates used by Verizon for specific job functions. Unilateral disclosure of these rates could adversely affect Verizon's ability to compete for talent in the marketplace.
3. This information contains the detailed cost components of various Operations Support Systems (OSS) used by Verizon. Disclosure of these detailed cost components would give competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient and effective manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.
4. This information details historical trends and future estimates. Cost information of this nature will give competitors an artificial competitive advantage in offering services where Verizon expects growth and to avoid offering competitive services in slower-growth areas.
5. This information contains the detailed cost components underlying discrete basic network functions. Disclosure of such detailed costs for such small pieces of the network would give competitors an 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.

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. 990649B-TP were sent via U.S. mail on November 28, 2001 to the parties on the attached list.



for Kimberly Caswell

Wayne Knight, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Pennington Law Firm *
Marc W. Dunbar
Karen M. Camechis
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

AT&T *
Marsha Rule
101 N. Monroe Street
Suite 700
Tallahassee, FL 32301-1549

BellSouth Telecommunications *
Nancy B. White
c/o Nancy H. Sims
150 South Monroe St., Suite 400
Tallahassee, FL 32301-1556

Florida Cable Telecomm. Assoc. *
Michael A. Gross
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Public Tele. Assoc.
Angela Green
2292 Wednesday Street
Suite 2
Tallahassee, FL 32308

MCI WorldCom Inc. *
Donna Canzano McNulty
The Atrium Building, Suite 105
325 John Knox Road
Tallahassee, FL 32303-4131

John Spilman
Broadslate Networks Inc.
675 Peter Jefferson Parkway
Suite 310
Charlottesville, VA 22911

Brent E. McMahan
VP-Reg./Govt. Affairs
Network Telephone Corp.
815 South Palafox Street
Pensacola, FL 32501

Time Warner Telecom *
Carolyn Marek
233 Bramerton Court
Franklin, TN 37069

Joseph McGlothlin *
McWhirter Reeves Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

Stephen C. Reilly
Office of Public Counsel
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

Bruce May
Holland Law Firm
315 S. Calhoun Street
Suite 600
Tallahassee, FL 32301

Richard D. Melson *
Gabriel E. Nieto
Hopping Law Firm
123 S. Calhoun Street
Tallahassee, FL 32314

Mark Buechele
Supra Telecommunications
Koger Center-Ellis Building
1311 Executive Center Drive
Suite 200
Tallahassee, FL 32301-5027

Vicki Gordon Kaufman *
McWhirter Reeves Law Firm
117 South Gadsden Street
Tallahassee, FL 32301

Gregory J. Darnell *
MCI WorldCom Inc.
Six Concourse Parkway
Suite 3200
Atlanta, GA 30328

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

Marc B. Rothschild
Robert Ridings
Swidler & Berlin
3000 K Street NW, Suite 300
Washington, DC 20007-5116

Catherine F. Boone *
Covad Comm. Co.
10 Glenlake Parkway
Suite 650
Atlanta, GA 30328-3495

Betty Willis *
Alltel Comm. Services Inc.
One Allied Drive
Little Rock, AR 72203-2177

John Fons/Jeff Wahlen *
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32302

Jim Lamoureux*
Virginia Tate*
AT&T
1200 Peachtree Street
Suite 8068
Atlanta, GA 30309

George S. Ford*
Chief Economist
Z-Tel Communications Inc.
601 S. Harbour Island Blvd.
Tampa, FL 33602

Jonathan E. Canis
Michael B. Hazzard
Kelley Drye & Warren
1200 19th St. NW, 5th Floor
Washington, DC 20036

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St. N.W., Suite 800
Washington, DC 20005-2004

Floyd R. Self
Messer Law Firm
215 S. Monroe Street
Suite 701
Tallahassee, FL 32302

Eric Branfman/Morton Posner *
Swidler & Berlin
3000 K Street NW, Suite 300
Washington, DC 20007-5116

Florida Digital Network, Inc.
390 North Orange Avenue
Suite 2000
Orlando, FL 32801

Charles Pellegrini
Patrick Wiggins
Katz Kutter Law Firm
106 East College Avenue
12th Floor
Tallahassee, FL 32301

Network Access Solutions Corp.
13650 Dulles Technology Drive
Herndon, VA 20171-4602