

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of )  
Unbundled Network Elements )  
\_\_\_\_\_ )

Docket No. 990649B-TP  
Filed: January 16, 2002

**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 produced in response to Staff's Second Request for Production of Documents (Nos. 27 and 44) and Staff's Second Set of Interrogatories (No. 59) 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).

Verizon's response to POD No. 27 consists of two confidential spreadsheets. The first, fpsscsplit.xls, is the spreadsheet used to calculate the percentages that were provided in response to Interrogatory 12(b) of Staff's Amended First Set of Interrogatories filed November 7, 2001. The second, fpsscstudy.xls, provides actual footage by wirecenter. The information contained in these spreadsheets is in excess of 3,000 pages. Therefore, only one soft copy on diskette is provided and is attached to the original of this Request.

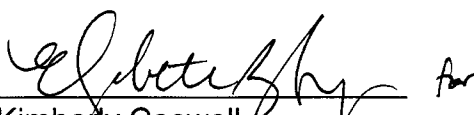
Verizon's response to POD No. 44 contains confidential responses provided by the ALECs to BellSouth. Verizon considers all these documents to be confidential as Verizon is not in a position to designate what specific information the ALECs consider to be confidential. One copy of these documents is attached to the original of this Request.

DOCUMENT NUMBER-DATE  
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Verizon's response to Interrogatory No. 59 contains highly confidential competitive information. This material is part of ongoing efforts of Verizon and Verizon management to engage in thoughtful considerations of the fundamental changes and challenges facing the telecommunications industry. To meet its fiduciary responsibilities, management must explore all alternatives, even those that may appear highly speculative and hypothetical. Public disclosure of Verizon's deliberations in this regard could cause it serious competitive harm. Verizon considers the entire document to be confidential. One copy of the document is attached to the original of this Request.

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." projections. This information, if publicly disclosed, would give Verizon's competitors an artificial competitive advantage, allowing them to successfully compete against Verizon without the usual market trial and error.

Respectfully submitted on January 16, 2002.

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