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January 25, 2002

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

Redacted
DOCUMENT NUMBER - DATE
00948 JAN 25 8
FPSC-COMMISSION CLERK

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

Please find enclosed for filing an original and one copy of Verizon Florida Inc.'s Notice of Service of Responses to Staff's Third Set of Interrogatories (Nos. 66-97), Notice of Service of Responses to Staff's Third Request for Production of Documents (Nos. 47-60) and an original and 15 copies of a Request for Confidential Classification regarding certain information produced in response to Staff's Third Request for Production of Documents. Also attached to this letter in a sealed envelope is page 7 of Tab A-1 of Verizon's NRC study which was inadvertently omitted from the paper copy of the NRC study filed on November 7, 2001. This PROPRIETARY and CONFIDENTIAL document is in response to Staff's POD No. 60 and is covered under Verizon's Request for Confidential Classification also filed on November 7, 2001.

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00947 JAN 25 8
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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
Kimberly Caswell

Request
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KC:tas
Enclosures

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Notice of Service
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649B-TP
Filed: January 25, 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 Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58 and 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 responses to POD Nos. 49, 50, 53, 57 and 58 are submitted on the attached confidential and proprietary CD. The time and motion studies on this CD contain detailed information about the operation of and labor and cost components underlying Verizon's network functions.

Verizon's response to POD No. 59 contains actual cost data about Verizon's National Market Centers. One highlighted copy and two redacted copies are also attached to 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

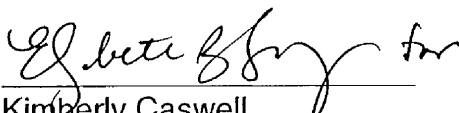
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artificial competitive advantage, allowing them to successfully compete against Verizon without the usual market trial and error. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed information.

Respectfully submitted on January 25, 2002.

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