

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 990649B-TP
Filed: February 27, 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 AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3, 6, 13 and 14) 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 Interrogatory No. 43 contains forecasted data for UNE, UNE-P, INP-LNP and LineShare. 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. This information also 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.

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Verizon's response to POD No. 3 contains SCIS input files.

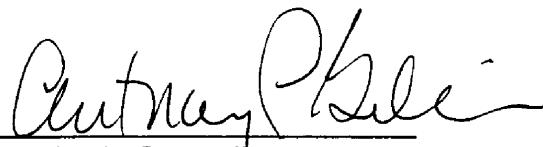
Verizon's response to POD No. 6 contains confidential vendor information including pricing.

Verizon's response to POD No. 13 contains SCIS model and Verizon input files which are provided on two proprietary CDs (SCIS/MO Release 2.6 and Release 2.6.1).

Verizon's response to POD No. 14 contain confidential vendor/Verizon engineering guidelines and practices.

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 February 27, 2002.

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