

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into Pricing of Unbundled)
Network Elements (Sprint/Verizon track))
_____)
Docket No. 990649B-TP
Filed: February 28, 2002

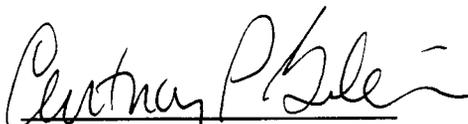
VERIZON FLORIDA INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

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 Fifth Set of Interrogatories (No. 108) 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).

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."

Verizon's response to Interrogatory No. 108 contains labor rates. Labor rates are routinely granted confidential protection. Their disclosure to Verizon's competitors would allow them to more successfully compete with Verizon in attracting and retaining employees, without the usual marketplace trial and error. One highlighted copy and two redacted copies of the confidential information are attached to this Request.

Respectfully submitted on February 28, 2002.

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