

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into Pricing of Unbundled )  
Network Elements (Sprint/Verizon track) )  
\_\_\_\_\_ )  
Docket No. 990649B-TP  
Filed: March 6, 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 Request for Production of Documents (Nos. 65 and 67) 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 POD No. 65 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 response also contains information which was used as input for Verizon's confidential NRC study filed November 7, 2001. Verizon's cost studies, including its NRC studies, are routinely granted confidential classification because disclosure of Verizon's costs would give competitors an undue advantage in tailoring their entry and pricing strategies to compete successfully with Verizon. One highlighted copy and two redacted copies of the confidential information are attached to this Request.

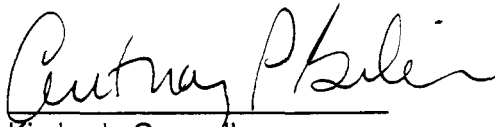
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Verizon's response to POD No. 67 contains confidential customer information at the wire center level and is provided on the enclosed proprietary CD. One redacted CD is also enclosed.

Respectfully submitted on March 6, 2002.

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