

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into pricing of unbundled )  
network elements (Sprint/Verizon track) )  
\_\_\_\_\_ )

Docket No. 990649B-TP  
Filed: March 18, 2002

**VERIZON FLORIDA INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in Exhibit DGT-5 to the Surrebuttal Testimony of David G. Tucek.

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."

Surrebuttal Exhibit DGT-5 contains a comparison of modeled investment per line in Verizon's ICM-FL cost study. This information also includes third-party confidential data. If competitors are able to acquire this sensitive costing information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon. These competitors would be more adept at pricing their own services if they possess details about Verizon's cost structure. This affords them an unfair advantage while severely jeopardizing Verizon's competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer.

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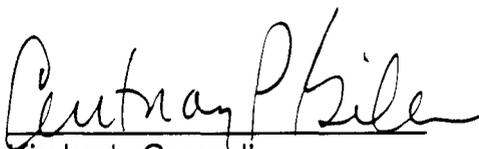
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While a ruling on this Request is pending, Verizon understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

One highlighted copy and two redacted copies of the confidential information are attached to the original of this Request.

Respectfully submitted on March 18, 2002.

By:   
Kimberly Caswell  
Post Office Box 110, FLTC0007  
Tampa, FL 33601  
Telephone: 813/483-2617

Attorney for Verizon Florida Inc.