

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of unbundled) Docket No. 990649B-TP
network elements (Sprint/Verizon track)) Filed: April 15, 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 Seventh Request for Production of Documents (Nos. 73, 78 and 92) 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 No. 73, 78 and 92 are submitted on the attached confidential and proprietary diskette.

Verizon's response to POD No. 73 contains Verizon's wire-center-specific costs for 2-wire loops. Verizon's response to POD No. 78 contains vendor pricing information on switching and line costs by wire center. This detailed information about Verizon's costs at a geographically disaggregated level will give Verizon's competitors an artificial advantage in fashioning their entry and expansion strategies in the most cost-effective manner. Disclosing wire-center-specific costs to Verizon's competitors would, for instance, allow them to know where Verizon might be most vulnerable to competition and what areas might be unduly costly to serve. The information about wire center-specific line counts would, likewise, give competitors an artificial advantage in structuring their marketing plans to achieve the most successful market entry for the least cost.

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Verizon's response to POD No. 92 contains the detailed cost components underlying discrete basic network functions. Disclosure of such detailed costs for such small pieces of the network would also give competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient manner.

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." This information, if publicly disclosed, would give Verizon's competitors an unfair and 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 April 15, 2002.

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