

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Investigation into appropriate methods ) Docket No. 000075-TP (Phase IIA)  
to compensate carriers for exchange of traffic ) Filed: April 18, 2002  
subject to Section 251 of the )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

**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 contained in its responses to Staff's First Request for Production of Documents (Nos. 4, 5, 6, 7) 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). Highlighted unredacted copies of pages 2 and 3 of Verizon's responses are attached to the original of this Request. The confidential responses to POD Nos. 6 and 7 are contained on the enclosed confidential diskette.

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 responses to POD Nos. 4 and 5 contain Verizon's average monthly intraLATA toll revenue per line, while its response to POD No. 7 contains revenue impact data on Verizon of converting all intraLATA intercarrier traffic in Florida to reciprocal compensation. The intraLATA market is intensely competitive, so information about a company's relative success in that market, measured here by its revenues, would be

This confidentiality request was filed by or for a "telco" for DN 04303-02. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

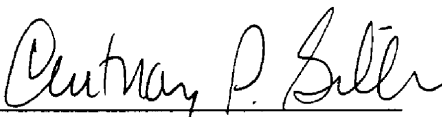
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valuable to another competitor in making market entry or expansion decisions, among other things.

Verizon's responses to POD No. 6 contain CLEC-specific billing information. Verizon believes the CLECs consider this information about their operations to be confidential and competitively sensitive. As such, Verizon must treat it as such under the terms of its interconnection agreements with those CLECs.

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.

Respectfully submitted on April 18, 2002.

By:   
for Kimberly Caswell  
P. O. Box 110, FLTC0007  
Tampa, Florida 33601  
Telephone: 813-483-2617

Attorney for Verizon Florida Inc.