

Kimberly Caswell
Vice President and General Counsel, Southeast
Legal Department

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FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-2606
Fax 813 204-8870
kimberly.caswell@verizon.com

April 29, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

1. Responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, 67) (original request filed November 7, 2001); 04645-02
04646-02
2. Confidential Exhibit DBT-3 (Direct Testimony of Dennis B. Trimble) (original request filed November 7, 2001); 04647-02
04648-02
3. Responses to Staff's Second Set of Interrogatories (No. 59) and Second Request for Production of Documents (Nos. 27 and 44) (original request filed January 16, 2002); 04649-02
04650-02
4. Responses to Staff's Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58, 59) (original request filed January 25, 2002); 04651-02
04652-02
5. Responses to AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3,6,13,14) (original request filed February 27, 2002); 04653-02
04654-02
6. Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002); 04655-02
04656-02


Ms. Blanca S. Bayo
April 29, 2002
Page 2

7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002);
04657-02
04658-02
8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and
04659-02
04660-02
9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001).
04661-02
04662-02

Highlighted copies of the confidential information are attached in sealed envelopes together with one redacted copy and a line-by-line justification (Exhibit-C).

If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,


ou Kimberly Caswell

KC:tas
Enclosures

c: Jason Fudge, Staff Counsel (w/e)

9906498-TP

Exhibit C
 Staff's Second Set of Interrogatories (No.59)
 and Second Request for Production of Documents (Nos. 27 and 44)

PageNos.	Line(s)/Column(s)	Reason
Bates stamped documents 2372-2376 (Int. No. 59)	All data except title and notice at bottom of each slide	This presentation discloses the ongoing efforts of Verizon management to engage in consideration of the fundamental changes and challenges facing the telecommunications industry and how it might best respond to those changes. Public disclosure of Verizon's strategic planning documents could cause serious competitive harm.
Diskette in response to POD No. 27	File: fpccsplit.xls File: fpccstudy.xls	Spreadsheet used to calculate the percentages provided in response to interrogatory 12(b) of Staff's Amended First Set of Interrogatories. Spreadsheet provides the actual footage by wirecenter. Data includes specific data detailing breakdown of metallic and fiber facilities in VZ Florida's network. Disclosure would give competitors and unfair advantage in designing their network. Due to the voluminous nature of this file (in excess of 3000 pages), Verizon requests confidential classification for the entire diskette.
Bates stamped documents 1970-2070 (POD No. 44)		These documents are not confidential. Request made in error.

Functional Perspective of Proposed Target Packet Telephony Infrastructure



REDACTED

NOTICE: This material is part of ongoing efforts of Verizon and Verizon management to engage in thoughtful considerations of the fundamental changes and challenges facing the telecommunications industry. To meet its fiduciary responsibilities, management must explore all alternatives, even those that may appear highly speculative and hypothetical. Statements and representations contained herein are preliminary and/or tentative and should not be relied on unless approved by the appropriate Verizon governing body.

Packet Telephony Evolution - Phase One



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Packet Telephony Phase One Technologies (e.g., VToA) are Becoming Real for Florida



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Packet Telephony Evolution - Phase Two



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Packet Telephony Evolution - Phase Three



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