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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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COMMISSION
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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


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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,


KC
Kimberly Caswell

KC:tas
Enclosures

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

9906498-TP ORIGINAL

Exhibit C
David G. Tucek's Surrebuttal Exhibit No. DGT-5

PageNos.	Line(s)/Column(s)	Reason
Surrebuttal Exhibit No. DGT-5	L4, 6 and 7 – highlighted information L13-17, col. A-C	The exhibit responds to the question: On a per-line basis, does ICM-FL model higher switch costs for the GTD-5 than it does for the 5ESS and Nortel switches? The information contains third-party vendor confidential data which is to be treated as confidential under Verizon's agreements with its vendors. 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.

DOCUMENT NUMBER - DATE

04659 APR 29 88

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/ Comparison of Modeled Investment per Line

3

Q. ON A PER-LINE BASIS, DOES ICM-FL MODEL HIGHER SWITCH COSTS FOR THE GTD-5 THAN IT DOES FOR THE 5ESS AND NORTEL SWITCHES?

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5
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A. XXX This is shown in the table below. Whether the modeled switch costs include or exclude power, test equipment, and the EF&I and IAF adjustments, the modeled switch investment per line for the XXXXXXXXXXXX is less than the modeled investment for the XXXXX and the XXXXXX.

8
9

Note that both the modeled investments shown below and the relative ordering of the three vendors are company and vendor confidential.

10
11
12
13
14
15
16
17

A	B	C
	Without Power, Test, EF&I and IAF Adjustments	With Power, Test, EF&I and IAF Adjustments
XXXXXXXX	\$XXXXXXXX	\$XXXXXXXX
XXXXXXXX	\$XXXXXXXX	\$XXXXXXXX
XXXXXXXX	\$XXXXXXXX	\$XXXXXXXX
XXXXXXXX	\$XXXXXXXX	\$XXXXXXXX
XXXXXXXX	\$XXXXXXXX	\$XXXXXXXX