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May 13, 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

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

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s Late-Filed Hearing Exhibit in the above matter. Also enclosed are an original and 15 copies of a Request for Confidential Classification. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,

Kimberly Caswell

KC:tas  
Enclosures

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FPSC-BUREAU OF RECORDS

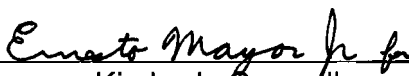
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Late-Filed Hearing Exhibit and Request for Confidential Classification in Docket No. 990649B-TP were sent via U.S. mail on May 13, 2002 to the parties on the attached list.

  
\_\_\_\_\_  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

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) Docket No. 990649B-TP  
) Filed: May 13, 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 its late-filed hearing exhibit 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).

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 late-filed hearing exhibit contains the costs for work orders that have been identified as associated with the establishment of the National Market Centers (NMCs) at Durham, North Carolina, Couer d'Alene, Idaho and Fort Wayne, Indiana. The work order costs include the costs of building and environmental modifications, computer equipment, and other labor and material costs associated with the establishment of the NMCs during the period September 1995-March 1998.

DOCUMENT NUMBER-DATE

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A highlighted copy of the confidential information is attached to the original of this Request as Exhibit A. Two redacted copies are also attached as Exhibit B together with a line-by-line justification as Exhibit C.

Respectfully submitted on May 13, 2002.

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

Attorney for Verizon Florida Inc.

**Docket No. 990649B**  
**Verizon Late-Filed Hearing Exhibit**

**Request: Provide historical cost for the National Market Centers.**

The following page lists the costs for those work orders that have been identified as associated with the establishment of the National Market Centers ("NMCs") at Durham, North Carolina, Couer d'Alene, Idaho, and Fort Wayne, Indiana. The work order costs include the costs of building and environmental modifications, computer equipment, and other labor and material costs associated with the establishment of the NMCs during the period September 1995 - March 1998. **These costs should not in any way be considered the total cost:**

- (1) The work order costs do not include the cost of the automatic call distribution system ("ACD"), which is provided under a service maintenance contract by an outside vendor.
- (2) The work orders listed are the only ones that Verizon's Service Cost Group could find during the limited discovery period. There may be other relevant work orders that have not been identified.

Back-up information, consisting of the work order cost detail, original business case cost filing and support, lease agreements, ACD maintenance contract, purchase orders, incurred expense reports, etc., is available for inspection at Verizon's offices located at 600 Hidden Ridge, Irving, Texas.

REDACTED

Docket No. 990649-B

Late Filed Hearing Exhibit

**VERIZON****National Market Centers****Summary of Work Center Costs by Year**

<u>A</u> <u>Year</u>	<u>B</u> <u>Work Order Number</u>	<u>C</u> <u>Cost</u>
1995:	7C001AG	
1996:	3C001AU 7C001AG 9G526MC 9G632GP	
1997:	3C001AS 3C001AT 3C001AU 7C001AG 9G526MC 9G632GP 9G681IC 9G705IC	
1998:	3C001AS 3C001AT 3C001AU 7C001AG 9G526MC 9G632GP 9G681IC 9G705IC	
	Work Order Totals	

NOTE: ACD COSTS ARE NOT INCLUDED IN THIS SUMMARY.

Back-up information, consisting of the work order cost detail, original business case cost filing and support, lease agreements, ACD maintenance contract, purchase orders, incurred expense reports, etc., is available for inspection at Verizon's offices located at 600 Hidden Ridge, Irving, TX.



Exhibit C  
Verizon Florida Inc.'s Late-Filed Hearing Exhibit  
May 13, 2002

<b>Page No.</b>	<b>Line(s)/Column(s)</b>	<b>Reason</b>
2	Column C - all lines	This work order cost data is considered confidential because it would provide Verizon's competitors with highly strategic information about the timing and magnitude of Verizon's investment in its National Market Centers. Such information about Verizon's infrastructure costs would give competitors unfair advantage by enabling them to target their business operating strategy to best compete against Verizon.

REDACTED

Docket No. 990649-B

Late Filed Hearing Exhibit

**VERIZON****National Market Centers****Summary of Work Center Costs by Year**

<u>A</u>	<u>B</u>	<u>C</u>
<u>Year</u>	<u>Work Order Number</u>	<u>Cost</u>
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1996:	3C001AU	
	7C001AG	
	9G526MC	
	9G632GP	
1997:	3C001AS	
	3C001AT	
	3C001AU	
	7C001AG	
	9G526MC	
	9G632GP	
	9G681IC	
	9G705IC	
1998:	3C001AS	
	3C001AT	
	3C001AU	
	7C001AG	
	9G526MC	
	9G632GP	
	9G681IC	
	9G705IC	

Work Order Totals

NOTE: ACD COSTS ARE NOT INCLUDED IN THIS SUMMARY.

Back-up information, consisting of the work order cost detail, original business case cost filing and support, lease agreements, ACD maintenance contract, purchase orders, incurred expense reports, etc., is available for inspection at Verizon's offices located at 600 Hidden Ridge, Irving, TX.

REDACTED

Docket No. 990649-B  
Late Filed Hearing Exhibit

**VERIZON****National Market Centers****Summary of Work Center Costs by Year**

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	Work Order Totals	

NOTE: ACD COSTS ARE NOT INCLUDED IN THIS SUMMARY.

Back-up information, consisting of the work order cost detail, original business case cost filing and support, lease agreements, ACD maintenance contract, purchase orders, incurred expense reports, etc., is available for inspection at Verizon's offices located at 600 Hidden Ridge, Irving, TX.