

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers for Commission )  
Action to Support Local Competition in BellSouth )  
Telecommunications Inc.'s Service Territory )

Docket No. 981834-TP  
Filed: January 16, 2003

Petition of ACI Corp. d/b/a Accelerated Connections, )  
Inc. for generic investigation to ensure that BellSouth )  
Telecommunications, Inc., Sprint-Florida, )  
Incorporated, and GTE Florida Incorporated comply )  
with obligation to provide alternative local exchange )  
carriers with flexible, timely, and cost-efficient )  
physical collocation )

Docket No. 990321-TP

**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 response to AT&T Communications of the Southern States, LLC's First Request for Production of Documents (No. 1) 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). A highlighted, unredacted copy of the confidential information is attached as Exhibit A to the original of this Request. Two redacted copies are attached as Exhibit B.

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."

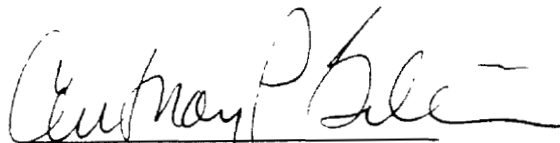
All of the information provided in Bates stamped document no. 1 contains AT&T site-by-site power requests. Verizon believes that AT&T would consider such collocation information highly competitive.

This confidentiality request was filed by or for a "telco" for DN 00495-03. 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.

DOCUMENT NUMBER-DATE  
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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 January 16, 2003.

By:   
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Attorney for Verizon Florida Inc.

FL-POWER-1-REDACTED

CLECNm	CO CLLI 8digit Location	ApplicationType	Completion Date	Total Amps per initial request	Power Reduction	New Total # of Amps	Date of Power Red
AT&T							

Avg Number of Amps