

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 Set of Interrogatories (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 page 2 of Verizon's response 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."

Verizon's response to Interrogatory No.1 contains customer specific information regarding AT&T's collocation arrangements in Verizon's central offices in Florida. Verizon believes that AT&T would consider such collocation information highly

This confidentiality request was filed by or for a "telco" for DN ~~00491-03~~ 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

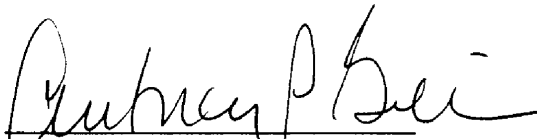
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competitive.

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.

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REDACTED

Response:

Verizon determined that a working collocation site requires a minimum of 10 load amps of DC power, and generally considerably more, based on the following.

- 1) AT&T currently has _____ collocation arrangements in Verizon central offices in Florida. The average load amperage ordered by AT&T at those sites is ___ amps, with a range of __ amps to ___ amps. AT&T ordered those levels of power despite the absence of the 10-amp minimum Verizon is currently proposing. Furthermore, even in those collocation arrangements where AT&T has recently reduced its ordered power, it is still ordering power at levels well above Verizon's proposed minimum. In April 2002, AT&T reduced power at ___ sites from ___ amps to ___ amps and reduced power at another location from ___ amps to ___ amps. Confidential Bates stamped document no. 1 (FL-POWER-1.XLS), provided in response to POD No. 1, provides site by site AT&T power requests.
- 2) During 2002, Verizon engaged in contract negotiations with an individual ALEC in which the structure of the DC Power rate element was hotly contested and thoroughly explored. The ALEC accepted a 10-amp minimum after determining that its collocation arrangements would always require at least 14 amps of DC power. Bates stamped document nos. 2-5 (FL-POWER-2.XLS), provided in response to POD No. 1, contains information provided by that ALEC exclusively. It shows the ALEC's 23 collocation configurations in the state of Florida, breaking down power drain by individual piece of equipment. As the documents demonstrate, the ALEC — running for the most part bare-bones collocation arrangements, consisting of only a DSLAM, a router, a DACS or LCS, and a testing device — drains no fewer than 15.1 amps in any Florida collocation arrangement.

Of all the ALECs in Florida who take power out of Verizon's Florida collocation tariff (as opposed to Verizon's FCC collocation tariff, which is where both AT&T and the ALECs described in number 2, above, order their power), not one takes less than 11 amps of power to run a functioning collocation arrangement. Bates stamped document nos. 6-7 (FL-POWER-3.XLS), provided in response to POD No. 1, shows the load amperage ordered by all 19 such ALECs for their 97 collocation arrangements in the month of December 2002. The range of amps ordered for functioning collocation arrangements stretched from 11 to 640, with an average of 131.