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February 4, 2003

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

RECEIVED: FPSC  
FEB 4 PM 12:47  
COMMISSION  
CLERK

Re: Docket No. 981834-TP  
Petition of Competitive Carriers for Commission Action to Support Local  
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP  
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

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of a Request for Confidential  
Classification in connection with Exhibits BKE-1 and BKE-2 to the Direct Testimony  
of Barbara K. Ellis (filed under separate cover) in the above matters. These exhibits  
are Verizon's proprietary and confidential cost studies. Also enclosed are three  
highlighted proprietary CDs, one redacted CD, eight highlighted paper copies and two  
redacted paper copies of the studies. 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

REQUEST - 01120-03  
3 CONFIDENTIAL CDs - 01121-03  
1 REDACTED CD - 01122-03  
8 CONFIDENTIAL NOTEBOOKS - 01123-03  
2 REDACTED COPIES - 01124-03

This confidentiality request was filed by or  
for a "telco" for DN 01121-03. 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.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission ) Docket No. 981834-TP  
Action to Support Local Competition in BellSouth ) Filed: February 4, 2003  
Telecommunications Inc.'s Service Territory )  
)

Petition of ACI Corp. d/b/a Accelerated Connections, ) Docket No. 990321-TP  
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 )  
)

**VERIZON FLORIDA INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in Exhibits BKE-1 and BKE-2 to the Direct Testimony of Barbara K. Ellis (Verizon Expanded Interconnection Services-Summary and Development of Costs and Rates and Dedicated Transit Service Wholesale Non-Recurring Study, respectively) filed in this matter.

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." The confidential information consists of third-party vendor/contractor sourced information, employee labor rates included in the cost study computations as well as the cost study methodology itself.

DOCUMENT NUMBER-DATE

01120 FEB-4-8

FPSC-COMMISSION CLERK


If competitors were able to acquire this detailed and sensitive costing information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon. This would afford them an unfair advantage while severely jeopardizing Verizon's competitive position. 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.

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).

At the request of Commission Staff, Verizon is providing three highlighted proprietary CDs, one redacted CD, eight highlighted paper copies, and two redacted paper copies of the studies. A detailed justification of the confidentiality of the information at issue is also attached.

Respectfully submitted on February 4, 2003.

By:

  
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(813) 483-2617

Attorney for Verizon Florida Inc.

**JUSTIFICATION FOR CONFIDENTIAL REQUEST  
VERIZON COLLOCATION COST STUDIES  
DOCKET NOS. 981834-TP/990321-TP**

**Exhibit BKE-1 - Expanded Interconnection Services - Summary & Development of Costs and Rates**

Each highlighted page contains a specific reason(s) (Nos. 1-4) for confidentiality.

Highlighted information on pages 103, 105, 108, 112, 113, 114, 116, 118, 121, 123, 126, 129, 140, 146, 147, 148, 149, 151, 152, 153, 154, 155, 156, 169, 170, 171, 175, 176, 177, 178, 179, 181, 182, 183, 184, 185, 186, 190, 191, 193, 194, 195, 196, 197, 198, 202, 203, 204, 205, 206, 207, 209, 210, 212, 213, 215, 216, 217, 219, 222, 223 and 232 is proprietary and confidential per reason no. 1 below:

1. The information contained in these files constitutes and is derived from algorithms and/or contractual prices provided to Verizon from third party vendors. Verizon's contractual obligations to those parties include the obligation not to disclose or distribute such proprietary or confidential information. Aside from violating contract terms, disclosure of this information would harm Verizon's future ability to contract for goods and/or services on favorable terms.

Highlighted information on pages 93, 95, 105, 112, 113, 114, 116, 118, 124, 127, 130, 132, 135, 140, 144, 146, 147, 148, 149, 156, 173, 174, 176, 177, 178, 220, 233 and 234 is proprietary and confidential per reason no. 2 below:

2. This information is derived from Verizon employee salary and labor rates. Unilateral disclosure of these rates could adversely affect Verizon's ability to compete for talent in the marketplace.

Highlighted information on pages 102, 103, 105, 107, 108, 114, 116, 118, 121, 123, 124, 126, 127, 129, 130, 132, 135, 140, 144, 146, 147, 148, 149, 151, 152, 153, 154, 155, 156, 158, 159, 160, 161, 163, 164, 165, 166, 167, 169, 170, 171, 173, 174, 175, 176, 177, 178, 179, 181, 182, 183, 184, 185, 186, 187, 190, 191, 193, 194, 195, 196, 197, 198, 199, 200, 202, 203, 204, 205, 206, 207, 209, 210, 212, 213, 215, 216, 217, 219, 220, 221, 222, 223, 229, 230, 231, 232 and 235 is proprietary and confidential per reason no. 3 below:

3. This information contains the detailed cost components underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design would give competitors an advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

Highlighted information on pages 102, 114, 116, 123, 135, 153, 154, 155, 156, 158, 159, 160, 161, 163, 164, 165, 166, 167, 170, 171, 221, 232 and 235 is proprietary and confidential per reason no. 4 below:

4. This information contains central office and outside-plant specific data. Disclosure of this information gives competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

### **Exhibit BKE-2 - Dedicated Transit Service Wholesale Non-Recurring Study**

Each highlighted page contains a specific reason(s) (Nos. 1-4) for confidentiality.

Highlighted information on pages 65, 66 and 67 is proprietary and confidential per reason no. 2 below:

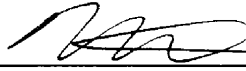
2. This information is derived from Verizon employee salary and labor rates. Unilateral disclosure of these rates could adversely affect Verizon's ability to compete for talent in the marketplace.

Highlighted information on pages 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 55, 56, 57, 58, 59, 60, 61 and 62 is proprietary and confidential per reason no. 3 below:

3. This information contains the detailed cost components underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design would give competitors an advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Confidential Classification in connection with Exhibits BKE-1 and BKE-2 to the Direct Testimony of Barbara K. Ellis in Docket Nos. 981834-TP and 990321-TP were sent via U. S. mail on February 4, 2003 to the parties on the attached list.



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