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March 21, 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

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 an original and fifteen copies of Verizon Florida Inc.'s Request  
for Confidential Classification and Motion for Protective Order in connection  
with Verizon's responses to Staff's Second Set of Interrogatories and Second Request  
for Production of Documents in the above matters. Service has been made as  
indicated on the Certificate of Service. If there are any questions regarding this filing,  
please contact me at 813-483-1256.

Sincerely,

Richard Chapkis

RC:tas

Enclosures

RECEIVED & FILED

R. V. W.

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

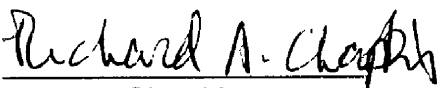


competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications 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).

One highlighted copy of the confidential information, along with two confidential diskettes, is attached to the original of this Request as Exhibit A. Two redacted copies are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is also attached.

Respectfully submitted on March 21, 2003.

By:   
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(813) 483-1256

Attorney for Verizon Florida Inc.

**JUSTIFICATION FOR CONFIDENTIAL REQUEST  
VERIZON FLORIDA'S RESPONSES TO  
STAFF'S SECOND SET OF INTERROGATORIES (NOS. 31-45) AND  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 4-18)  
DOCKET NOS. 981834-TP/990321-TP**

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

The following documents are confidential for reasons 3 and 4:

Attachment for Interrogatory No. 42 (Bates No. 30)  
Attachment for POD 4 (Bates Nos. 36-61)  
Attachment for POD 5(c) (Bates Nos. 62-68)  
Attachment for POD 5(d) (Bates No. 69)  
Attachment for POD 6 (Bates Nos. 70-71)  
Attachment for POD 8(a) (Bates Nos. 72-74)  
Attachment for POD 13 (Bates No. 76)  
Attachment for POD 16 (Bates No. 77)

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.
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.

The following document is confidential for reasons 1 and 2:

Attachment for POD 12(a) (Bates No. 75)

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.
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.

Attachment for Interrogatory No. 43(c) (Bates Nos. 31-33) is confidential for reason 4.

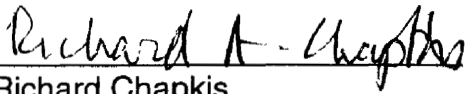
4. This information contains central office and outside-plant specific data. Disclosure of this information gives competitors an unfair advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors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

**VERIZON REDACTION REASONS**  
**DOCKET NOS. 981834-TP/990321-TP**

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.
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.
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.
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.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in Docket Nos. 981834-TP and 990321-TP were sent via electronic mail and U.S. mail on March 20, 2003 to the parties on the attached list.

  
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