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March 31, 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
APR - 1 PM 3:26
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 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 Third 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


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03043 APR-18

FPSC-COMMISSION CLERK

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: March 31, 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 its responses to Staff's Third Request for Production of Documents (specifically POD Nos. 21, 22, 23 and 35) 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." If competitors were able to acquire this detailed and sensitive 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

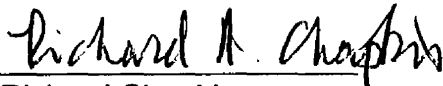
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FPSC-COMMISSION CLERK

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 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 attached as Exhibit C.

Respectfully submitted on March 31, 2003.

By: 
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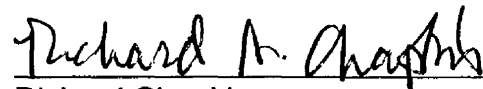
Attorney for Verizon Florida Inc.

EXHIBIT C

PAGE NOS.	LINE(S)/COLUMN(S)	REASON
POD Nos. 21, 22 23: 86-105, 108-119, 121-135, 138-143, 145-148, 150-153, 158-162, 165-186, 188-190, 192, 197-211, 214-225	All highlighted text	This information was included in Verizon management presentations to industry rating agencies. The information addresses Verizon's financial condition and details its strategies for competing in wireline markets. Rating agency presentations are typically considered highly confidential within the industry. Public disclosure of Verizon's potential competitive strengths and weaknesses by market sector would give competitors an obvious and unfair advantage.
POD No. 35: 241, 245, 254, 259, 269, 271, 283, 288, 307, 308	All highlighted text	This information was presented to Verizon management and contains competitive analyses and strategic objectives for competing in the Florida telecommunications market. Public disclosure of Verizon's competitive assessments by market segment, as well as its market response plans, would give competitors an obvious and unfair competitive advantage.

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 31, 2003 to the parties on the attached list.


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