

ORIGINAL

Richard Chapkis
Vice President & General Counsel, Southeast Region
Legal Department



FLTC0007
201 North Franklin Street (33602)
Post Office Box 110
Tampa, Florida 33601-0110

Phone 813 483-1256
Fax 813 273-9825
richard.chapkis @verizon.com

May 19, 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
03 MAY 20 AM 11:32
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 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 Sixth Set of Interrogatories (Nos. 98 and 99) 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,

AUS _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
OTH _____

Richard A. Chapkis

Richard Chapkis

RC:tas

Enclosures

03 MAY 20 AM 11:32

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NO.
04515-03
5.20.03

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: May 19, 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 Sixth Set of Interrogatories (Nos. 98 and 99) 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

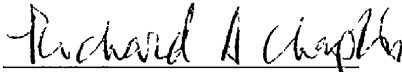
DOCUMENT NO.
04516-03
5.20.03

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 May 19, 2003.

By: 
Richard Chapkis
P. O. Box 110, FLTC0717
Tampa, FL 33602
(813) 483-1256

Attorney for Verizon Florida Inc.

VERIZON - FLORIDA

COLLOCATION - INVESTMENT SUMMARY

LINE NO	ITEM	TOTAL CENTRAL OFFICE <u>INVESTMENT</u>	TOTAL LAND & BUILDING <u>INVESTMENT</u>	TOTAL OUTSIDE PLANT <u>INVESTMENT</u>	TOTAL INVESTMENT <u>(ALL ACCOUNTS)</u>
1	CAGED				
2	CAGELESS				
3	VIRTUAL		REDACTED		
4	ADJACENT				
5	CATT				
6	TOTALS				

EXHIBIT D

VERIZON - FLORIDA

MRCs	REGION	Arrangement	RATE ELEMENT	DESCRIPTION	INCREMENT	MATERIAL	EF&I
						INVESTMENT	FACTOR
						A	B
1	WEST	CAGED	BUILDING MODIFICATION	1/2' CONDUIT HANGERS AND SUPPORTS-ELECTRICAL OUTLET	PER OUTLET		
2	WEST	CAGED	BUILDING MODIFICATION	1/2' CONDUIT HANGERS AND SUPPORTS-LIGHTING FIXTURE	PER UNIT		
3	WEST	CAGED	BUILDING MODIFICATION	1/2' CONDUIT HANGERS AND SUPPORTS-ELECTRICAL OUTLET	PER OUTLET		
4	WEST	CAGED	BUILDING MODIFICATION	1/2" COUPLING-CONDUIT - LIGHT FIXTURE	PER UNIT		
5	WEST	CAGED	BUILDING MODIFICATION	2-40 WATT LAMP FIXTURES - LIGHT FIXTURE	PER UNIT		
6	WEST	CAGED	BUILDING MODIFICATION	2-DOOR CABINETS FOR TEST EQUIPMENT	PER COLLO OFFICE		
7	WEST	CAGED	BUILDING MODIFICATION	3" PVC SCH. 40 CONDUIT - FLOOR GROUND BAR	PER BAR		
8	WEST	CAGED	BUILDING MODIFICATION	4" FLUSH COVER BLANK - LIGHT FIXTURE	PER UNIT		
9	WEST	CAGED	BUILDING MODIFICATION	40 WATT LAMP - LIGHT FIXTURE	PER UNIT		
10	WEST	CAGED	BUILDING MODIFICATION	750 MCM GROUNDING CABLE - FLOOR GROUND BAR	PER BAR		REDACTED
11	WEST	CAGED	BUILDING MODIFICATION	90 OR 45 DEGREE ELLS -BUILDING MOD - ELECTRICAL OUTLET	PER OUTLET		
12	WEST	CAGED	BUILDING MODIFICATION	90 OR 45 DEGREE ELLS -BUILDING MOD. - LIGHT FIXTURE	PER UNIT		
13	WEST	CAGED	CAGED FLOOR SPACE	BUILDING FLOOR SPACE (WEST)	PER SQ FT		
14	WEST	CAGED	CABLE RACK SHARED SPACE - FIBER	CABLE RACK SHARED SPACE - FIBER	PER INNERDUCT FT		
15	WEST	CAGED	CABLE RACK SHARED SPACE - METALLIC	CABLE RACK SHARED SPACE - METALLIC	PER LINEAR FT		
16	WEST	CAGED	CABLE SUBDUCT SPACE	CABLE SUBDUCT SPACE	PER LINEAR FT		
17	WEST	CAGED	CABLE SUBDUCT SPACE-MANHOLE	CABLE SUBDUCT SPACE-MANHOLE	PER PROJECT		
18	WEST	CAGED	BUILDING MODIFICATION	CARD READER	PER READER		
19	WEST	CAGED	BUILDING MODIFICATION	CIRCUIT BREAKER - ELECTRICAL OUTLET	PER OUTLET		
20	WEST	CAGED	BUILDING MODIFICATION	CIRCUIT BREAKER - LIGHT FIXTURE	PER UNIT		
21	WEST	CAGED	BUILDING MODIFICATION	CONTROLLER	PER CONTROLLER		
22	WEST	CAGED	BUILDING MODIFICATION	DEMOLITION & SITE WORK	PER REQUEST		
23	WEST	CAGED	BUILDING MODIFICATION	DUST PARTITION	PER REQUEST		
24	WEST	CAGED	BUILDING MODIFICATION	ELECTRICAL RECEPTACLE - ELECTRICAL OUTLET	PER OUTLET		
25	WEST	CAGED	BUILDING MODIFICATION	ELECTRICAL WIRE (100 LF) - ELECTRICAL OUTLET	PER OUTLET		
26	WEST	CAGED	BUILDING MODIFICATION	ELECTRICAL WIRE (100 LF) - LIGHT FIXTURE	PER UNIT		
27	WEST	CAGED	ENVIRONMENTAL CONDITIONING	ENVIRONMENTAL CONDITIONING	PER AMP		
28	WEST	CAGED	FACILITY TERMINATION - DS0	FACILITY TERMINATION - DS0	PER 100 PR		
29	WEST	CAGED	FACILITY TERMINATION - DS1	FACILITY TERMINATION - DS1	PER 28 PR		
30	WEST	CAGED	FACILITY TERMINATION - DS3	FACILITY TERMINATION - DS3	PER COAXIAL		
31	WEST	CAGED	BUILDING MODIFICATION	FILING CABINETS FOR CIRCUIT LAYOUT RECORDS	PER COLLO OFFICE		
32	WEST	CAGED	DC POWER	FUSES & FUSE PANELS (BDFB)	PER AMP		
33	WEST	CAGED	BUILDING MODIFICATION	FLOOR GROUND BAR	PER BAR		
34	WEST	CAGED	BUILDING MODIFICATION	HVAC MINOR	PER OCCURRENCE		
35	WEST	CAGED	CAGED FLOOR SPACE	LAND FLOOR SPACE (WEST)	PER SQ FT		
36	WEST	CAGED	BUILDING MODIFICATION	OCTAGON OUTLET BOX - LIGHT FIXTURE	PER UNIT		
37	WEST	CAGED	BUILDING MODIFICATION	OUTLET BOX COVER - ELECTRICAL OUTLET	PER OUTLET		
38	WEST	CAGED	DC POWER	POWER SUPPLY	PER AMP		
39	WEST	CAGED	BUILDING MODIFICATION	RACK LOCK FOR EXPOSED TEST EQUIPMENT	PER COLLO OFFICE		
40	WEST	CAGED	BUILDING MODIFICATION	RECEPTACAL COVER - ELECTRICAL OUTLET	PER OUTLET		
41	WEST	CAGED	BUILDING MODIFICATION	RIGID GALVANIZED STEEL CONDUIT - ELECTRICAL OUTLET	PER OUTLET		
42	WEST	CAGED	BUILDING MODIFICATION	RIGID GALVANIZED STEEL CONDUIT- LIGHT FIXTURE	PER UNIT		
43	WEST	CAGED	BUILDING MODIFICATION	SERVICE CALL - BUILDING MOD CONTRACTOR - ELECTRICAL OU	PER OUTLET		
44	WEST	CAGED	BUILDING MODIFICATION	SERVICE CALL - BUILDING MOD CONTRACTOR - LIGHT FIXTURE	PER UNIT		
45	WEST	CAGED	BUILDING MODIFICATION	SWITCH BOX - ELECTRICAL OUTLET	PER OUTLET		
46	WEST	CAGED	BUILDING MODIFICATION	SWITCH COVER - LIGHT FIXTURE	PER UNIT		
47	WEST	CAGED	BITS TIMING	BITS TIMING	PER PORT		
48	WEST	CAGED	CABLE VAULT SPLICE - 48 FIBER	CABLE VAULT SPLICE - 48 FIBER	PER SPLICE CLOSURE		
49	WEST	CAGED	CABLE VAULT SPLICE - 96 FIBER	CABLE VAULT SPLICE - 96 FIBER	PER SPLICE CLOSURE		
50	WEST	CAGED	CABLE VAULT SPACE - FIBER	CABLE VAULT SPACE - FIBER	PER SUBDUCT		
51	WEST	CAGED	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	PER CONNECTOR		
52	WEST	CAGED	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	R FIBER STRAND PER FOOT		

Total Investment

Sources

- Column A = Material Investments taken from FL ver 7 cost study
- Column B = EF&I factor received from Pat Haramija.
- Column E & F = was developed by West's Collocation Product Management and Costing Teams.
- Column G = Demand Amounts were extracted from the Collocation Central Database

EF&I AMOUNT C=A*B	TOTAL INVESTMENT AMOUNT D=A+B	UNITS REQUIRED PER ARRANGEMENT E	ARRANGEMENTS REQUIRED PER CENTRAL OFFICE F	# OF ARRANGEMENTS G	TOTAL INVESTMENT AMOUNT H=D*E*F*G	ACCOUNT NUMBER I	CENTRAL OFFICE INVESTMENT J	LAND & BUILDING INVESTMENT K	OUTSIDE PLANT INVESTMENT L
-------------------------	--	--	--	---------------------------	---	------------------------	-----------------------------------	------------------------------------	----------------------------------

REDACTED

MRCs	REGION	Arrangement	RATE ELEMENT	DESCRIPTION	INCREMENT	MATERIAL	EF&I	EF&I
						INVESTMENT	FACTOR	AMOUNT
						A	B	C=A*B
1	WEST	CAGELESS	BUILDING MODIFICATION	1/2" CONDUIT HANGERS AND SUPPORTS-ELECTRICAL OUTLET	PER OUTLET			
2	WEST	CAGELESS	BUILDING MODIFICATION	1/2" CONDUIT HANGERS AND SUPPORTS-LIGHTING FIXTURE	PER UNIT			
3	WEST	CAGELESS	BUILDING MODIFICATION	1/2" CONDUIT HANGERS AND SUPPORTS-ELECTRICAL OUTLET	PER OUTLET			
4	WEST	CAGELESS	BUILDING MODIFICATION	1/2" COUPLING-CONDUIT - LIGHT FIXTURE	PER UNIT			
5	WEST	CAGELESS	BUILDING MODIFICATION	2-40 WATT LAMP FIXTURES - LIGHT FIXTURE	PER UNIT			
6	WEST	CAGELESS	BUILDING MODIFICATION	2-DOOR CABINETS FOR TEST EQUIPMENT	PER COLLO OFFICE			
7	WEST	CAGELESS	BUILDING MODIFICATION	3" PVC SCH 40 CONDUIT - FLOOR GROUND BAR	PER BAR			
8	WEST	CAGELESS	BUILDING MODIFICATION	4" FLUSH COVER BLANK - LIGHT FIXTURE	PER UNIT			
9	WEST	CAGELESS	BUILDING MODIFICATION	40 WATT LAMP - LIGHT FIXTURE	PER UNIT			
10	WEST	CAGELESS	BUILDING MODIFICATION	750 MCM GROUNDING CABLE - FLOOR GROUND BAR	PER BAR			
11	WEST	CAGELESS	BUILDING MODIFICATION	90 OR 45 DEGREE ELLS -BUILDING MOD - ELECTRICAL OUTLET	PER OUTLET			
12	WEST	CAGELESS	BUILDING MODIFICATION	90 OR 45 DEGREE ELLS -BUILDING MOD - LIGHT FIXTURE	PER UNIT		REDACTED	
13	WEST	CAGELESS	CAGED FLOOR SPACE	BUILDING FLOOR SPACE (WEST)	PER SQ FT			
14	WEST	CAGELESS	CABLE RACK SHARED SPACE - FIBER	CABLE RACK SHARED SPACE - FIBER	PER INNERDUCT FT			
15	WEST	CAGELESS	CABLE RACK SHARED SPACE - METALLIC	CABLE RACK SHARED SPACE - METALLIC	PER LINEAR FT			
16	WEST	CAGELESS	CABLE SUBDUCT SPACE	CABLE SUBDUCT SPACE	PER LINEAR FT			
17	WEST	CAGELESS	CABLE SUBDUCT SPACE-MANHOLE	CABLE SUBDUCT SPACE-MANHOLE	PER PROJECT			
18	WEST	CAGELESS	BUILDING MODIFICATION	CARD READER	PER READER			
19	WEST	CAGELESS	BUILDING MODIFICATION	CIRCUIT BREAKER - ELECTRICAL OUTLET	PER OUTLET			
20	WEST	CAGELESS	BUILDING MODIFICATION	CIRCUIT BREAKER - LIGHT FIXTURE	PER UNIT			
21	WEST	CAGELESS	BUILDING MODIFICATION	CONTROLLER	PER CONTROLLER			
22	WEST	CAGELESS	BUILDING MODIFICATION	DEMOLITION & SITE WORK	PER REQUEST			
23	WEST	CAGELESS	BUILDING MODIFICATION	DUST PARTITION	PER REQUEST			
24	WEST	CAGELESS	BUILDING MODIFICATION	ELECTRICAL RECEPTACLE - ELECTRICAL OUTLET	PER OUTLET			
25	WEST	CAGELESS	BUILDING MODIFICATION	ELECTRICAL WIRE (100 LF) - ELECTRICAL OUTLET	PER OUTLET			
26	WEST	CAGELESS	BUILDING MODIFICATION	ELECTRICAL WIRE (100 LF) - LIGHT FIXTURE	PER UNIT			
27	WEST	CAGELESS	ENVIRONMENTAL CONDITIONING	ENVIRONMENTAL CONDITIONING	PER AMP			
28	WEST	CAGELESS	FACILITY TERMINATION - DS0	FACILITY TERMINATION - DS0	PER 100 PR			
29	WEST	CAGELESS	FACILITY TERMINATION - DS1	FACILITY TERMINATION - DS1	PER 28 PR			
30	WEST	CAGELESS	FACILITY TERMINATION - DS3	FACILITY TERMINATION - DS3	PER COAXIAL			
31	WEST	CAGELESS	BUILDING MODIFICATION	FILING CABINETS FOR CIRCUIT LAYOUT RECORDS	PER COLLO OFFICE			
32	WEST	CAGELESS	DC POWER	FUSES & FUSE PANELS (BDFB)	PER AMP			
33	WEST	CAGELESS	BUILDING MODIFICATION	FLOOR GROUND BAR	PER BAR			
34	WEST	CAGELESS	BUILDING MODIFICATION	HVAC MINOR	PER OCCURRENCE			
35	WEST	CAGELESS	CAGED FLOOR SPACE	LAND FLOOR SPACE (WEST)	PER SQ FT			
36	WEST	CAGELESS	BUILDING MODIFICATION	OCTAGON OUTLET BOX - LIGHT FIXTURE	PER UNIT			
37	WEST	CAGELESS	BUILDING MODIFICATION	OUTLET BOX COVER - ELECTRICAL OUTLET	PER OUTLET			
38	WEST	CAGELESS	DC POWER	POWER SUPPLY	PER AMP			
39	WEST	CAGELESS	BUILDING MODIFICATION	RACK LOCK FOR EXPOSED TEST EQUIPMENT	PER COLLO OFFICE			
40	WEST	CAGELESS	BUILDING MODIFICATION	RECEPTACLE COVER - ELECTRICAL OUTLET	PER OUTLET			
41	WEST	CAGELESS	BUILDING MODIFICATION	RIGID GALVANIZED STEEL CONDUIT - ELECTRICAL OUTLET	PER OUTLET			
42	WEST	CAGELESS	BUILDING MODIFICATION	RIGID GALVANIZED STEEL CONDUIT- LIGHT FIXTURE	PER UNIT			
43	WEST	CAGELESS	BUILDING MODIFICATION	SERVICE CALL - BUILDING MOD CONTRACTOR - ELECTRICAL OU	PER OUTLET			
44	WEST	CAGELESS	BUILDING MODIFICATION	SERVICE CALL - BUILDING MOD CONTRACTOR - LIGHT FIXTURE	PER UNIT			
45	WEST	CAGELESS	BUILDING MODIFICATION	SWITCH BOX - ELECTRICAL OUTLET	PER OUTLET			
46	WEST	CAGELESS	BUILDING MODIFICATION	SWITCH COVER - LIGHT FIXTURE	PER UNIT			
47	WEST	CAGED	BITS TIMING	BITS TIMING	PER PORT			
48	WEST	CAGED	CABLE VAULT SPLICE - 48 FIBER	CABLE VAULT SPLICE - 48 FIBER	PER SPLICE CLOSURE			
49	WEST	CAGED	CABLE VAULT SPLICE - 96 FIBER	CABLE VAULT SPLICE - 96 FIBER	PER SPLICE CLOSURE			
50	WEST	CAGED	CABLE VAULT SPACE - FIBER	CABLE VAULT SPACE - FIBER	PER SUBDUCT			
51	WEST	CAGED	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	PER CONNECTOR			
52	WEST	CAGED	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	3 FIBER STRAND PER FOOT			
Total Investment								

Sources.

Column A = Material Investments taken from FL ver 7 cost study.

Column B = EF&I factor received from Pat Haramija

Column E & F = was developed by West's Collocation Product Management and Costing Teams.

Column G = Demand Amounts were extracted from the Collocation Central Database

TOTAL INVESTMENT AMOUNT D=A+B	UNITS REQUIRED PER ARRANGEMENT E	ARRANGEMENTS REQUIRED PER CENTRAL OFFICE F	# OF ARRANGEMENTS G	TOTAL INVESTMENT AMOUNT H=D*E*F*G	ACCOUNT NUMBER I	CENTRAL OFFICE INVESTMENT J	LAND & BUILDING INVESTMENT K	OUTSIDE PLANT INVESTMENT L
--	--	--	---------------------------	---	------------------------	-----------------------------------	------------------------------------	----------------------------------

REDACTED

VERIZON - FLORIDA

MRCs	REGION	Arrangement	RATE ELEMENT	DESCRIPTION	INCREMENT	MATERIAL	EF&I
						INVESTMENT	FACTOR
						A	B
1	WEST	VIRTUAL	CABLE RACK SHARED SPACE - FIBER	CABLE RACK SHARED SPACE - FIBER	PER INNERDUCT FT		
2	WEST	VIRTUAL	CABLE RACK SHARED SPACE - METALLIC	CABLE RACK SHARED SPACE - METALLIC	PER LINEAR FT		
3	WEST	VIRTUAL	CABLE SUBDUCT SPACE	CABLE SUBDUCT SPACE	PER LINEAR FT		
4	WEST	VIRTUAL	CABLE SUBDUCT SPACE-MANHOLE	CABLE SUBDUCT SPACE-MANHOLE	PER PROJECT		
5	WEST	VIRTUAL	FACILITY TERMINATION - DS0	FACILITY TERMINATION - DS0	PER 100 PR		
6	WEST	VIRTUAL	FACILITY TERMINATION - DS1	FACILITY TERMINATION - DS1	PER 28 PR		
7	WEST	VIRTUAL	FACILITY TERMINATION - DS3	FACILITY TERMINATION - DS3	PER COAXIAL		REDACTED
8	WEST	VIRTUAL	DC POWER	FUSES & FUSE PANELS (BDFB)	PER AMP		
9	WEST	VIRTUAL	DC POWER	POWER SUPPLY	PER AMP		
10	WEST	VIRTUAL	VIRTUAL EQUIP MAINT & FRAME SPACE	VIRTUAL EQUIP MAINT & FRAME SPACE	PER QUARTER RACK		
11	WEST	VIRTUAL	ENVIRONMENTAL CONDITIONING	ENVIRONMENTAL CONDITIONING	PER AMP		
12	WEST	CAGED	BITS TIMING	BITS TIMING	PER PORT		
12	WEST	CAGED	CABLE VAULT SPLICE - 48 FIBER	CABLE VAULT SPLICE - 48 FIBER	PER SPLICE CLOSURE		
13	WEST	CAGED	CABLE VAULT SPLICE - 96 FIBER	CABLE VAULT SPLICE - 96 FIBER	PER SPLICE CLOSURE		
14	WEST	CAGED	CABLE VAULT SPACE - FIBER	CABLE VAULT SPACE - FIBER	PER SUBDUCT		
14	WEST	CAGED	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	FACILITY TERMINATION - FIBER OPTIC PATCHCORD	PER CONNECTOR		
15	WEST	CAGED	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	CABLE DUCT SPACE - FIBER OPTIC PATCHCORD	PER FIBER STRAND PER FOOT		
Total Investment							

Sources

- Column A = Material Investments taken from FL ver 7 cost study
- Column B = EF&I factor received from Pat Haramija.
- Column E & F = was developed by West's Collocation Product Management and Costing Teams.
- Column G = Demand Amounts were extracted from the Collocation Central Database.

<u>EF&I AMOUNT</u> C=A*B	<u>TOTAL INVESTMENT AMOUNT</u> D=A+B	<u>UNITS REQUIRED PER ARRANGEMENT</u> E	<u>ARRANGEMENTS REQUIRED PER CENTRAL OFFICE</u> F	<u># OF ARRANGEMENTS</u> G	<u>TOTAL INVESTMENT AMOUNT</u> H=D*E*F*G	<u>ACCOUNT NUMBER</u> I	<u>CENTRAL OFFICE INVESTMENT</u> J	<u>LAND & BUILDING INVESTMENT</u> K	<u>OUTSIDE PLANT INVESTMENT</u> L
---------------------------------	---	--	--	-------------------------------	---	----------------------------	---------------------------------------	--	--------------------------------------

REDACTED

Expense Factor for Florida Cost of Money Analysis

Source = 2000 FL Fact Finder database

YEAR	ST_DESC	STATE	ACCT	ACCT_DESC	Plant Non-Specific	Sales	Marketing	Operations	Order Processing	Other Tax	Netsup	Advertising	BC Other	Corporate Operations Expense	Gensup	Maintenance	Total
2000	VERIZON WEST FLORIDA	FL1V	221200	DIGITAL ELEC SWITCHING													
2000	VERIZON WEST FLORIDA	FL1V	223211	ANALOG CIRCUIT EQUIPMENT													
2000	VERIZON WEST FLORIDA	FL1V	223212	ANALOG CIRCUIT TEST SYS													
2000	VERIZON WEST FLORIDA	FL1V	223221	DIGITAL CIRCUIT EQUIPMENT													
2000	VERIZON WEST FLORIDA	FL1V	223222	DIGITAL CIRCUIT TEST SYS													
2000	VERIZON WEST FLORIDA	FL1V	223223	LIGHTWAVE CIRCUIT EQUIP													
			223200	DIGITAL CIRCUIT EQUIPMENT													
2000	VERIZON WEST FLORIDA	FL1V	242210	UNDERGRND CABLE-METALLIC													
2000	VERIZON WEST FLORIDA	FL1V	242220	UNDERGRND CABLE-NON-MET													
2000	VERIZON WEST FLORIDA	FL1V	244100	CONDUIT SYSTEMS													

REDACTED

Verizon: EIS Study - Florida
 Monthly Recurring Costs
 Annual Cost Factors (ACFs)
 Rate of Return = 18.36%

Account	Description	Capital Recovery	Composite Tax	Pool Factor	Property Tax	Total ACF
211100	Land					
212100	Buildings					
221200	Digital Electronic Switching					
223200	Circuit Equipment			REDACTED		
242210	Underground Cable-Metallic					
242220	Underground Cable-Fiber					
244100	Conduit Systems					

EXHIBIT C

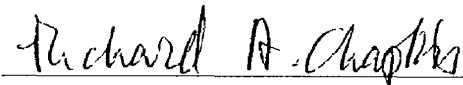
PAGE NOS.	LINE(S)/COLUMN(S)	REASON
INT No. 98: (561)	All highlighted text	This information contains the detailed cost components underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design would give competitors an advantage 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.
INT No. 99: (456-463)	All highlighted text	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.

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 May 19, 2003 to the parties on the attached list.


Richard A. Chapkis
Richard Chapkis

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Nancy Sims
BellSouth Telecomm. Inc.
150 S. Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Rodney L. Joyce
Shook Hardy & Bacon LLP
600 14th St NW, Suite 800
Washington, DC 20005-2004

Virginia C. Tate/Lisa A. Riley
AT&T
1200 Peachtree Street N.E.
Suite 8066
Atlanta, GA 30309-3523

Blue Star Communications Inc.
c/o Robert Waldschmidt
Howell & Fisher
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201-1107

Floyd R. Self
Messer Law Firm
P. O. Box 1876
Tallahassee, FL 32302

Peter M. Dunbar
Barbara Auger
Pennington Law Firm
215 S. Monroe St., 2nd Floor
Tallahassee, FL 32301

Catherine Ronis
Daniel McCuaig
Jonathan Frankel
Wilmer Cutler & Pickering
2445 M Street N.W.
Washington, DC 20037-1420

Nanette S. Edwards
ITC^DeltaCom
4092 S. Memorial Parkway
Huntsville, AL 35802-4343

Kenneth Hoffman
Rutledge Law Firm
215 S. Monroe St., Suite 420
Tallahassee, FL 32302

Andrew Isar
Telecomm. Resellers Assn.
c/o Miller Isar, Inc.
7901 Skansie Ave., Suite 240
Gig Harbor, WA 98335

Pam Keillor
Katz Kutter Law Firm
106 E. College Avenue
12th Floor
Tallahassee, FL 32301

Terry Monroe/Genevieve Morelli
CompTel
1900 M Street N.W.
Suite 800
Washington, DC 20036

Michael A. Gross
Florida Cable Telecomm. Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Vicki Kaufman/Joe McGlothlin
McWhirter Law Firm
117 S. Gadsden Street
Tallahassee, FL 32301

David Tobin
Fla. Public Telecomm. Assn.
c/o Tobin & Reyes
7251 W. Palmetto Park Road
#205
Boca Raton, FL 33433-3487

John D. McLaughlin, Jr.
KMC Telecom Inc.
1755 North Brown Road
Lawrenceville, GA 30043-8119

Deborah Eversole
General Counsel
Kentucky Public Service Comm.
P. O. Box 615
Frankfort, KY 40602

Mark E. Buechele
Supra Telecommunications
2620 SW 27th Avenue
Miami, FL 33133

Laura L. Gallagher
MediaOne Florida Tele.
101 E. College Avenue
Suite 302
Tallahassee, FL 32301

Don Sussman
Network Access Solutions Corp.
Three Dulles Tech Center
13650 Dulles Technology Drive
Herndon, VA 20171-4602

William H. Weber
Covad Communications Co.
1230 Peachtree Street N.E.
19th Floor
Atlanta, GA 30309-3574

S. Masterton/C. Rehwinkel
Sprint-Florida Incorporated
1313 Blairstone Road
MC FLTLHO0107
Tallahassee, FL 32301

Carolyn Marek
Time Warner Telecom
233 Bramerton Court
Franklin, TN 37069

Bettye Willis
ALLTEL Communications
Services Inc.
One Allied Drive
Little Rock, AR 72203

J. Jeffry Wahlen
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32302

Anu Seam
U.S. Department of Justice
Telecom Task Force
Antitrust Division
1401 H Street N.W., Suite 8000
Washington, DC 20530

Brent McMahan
Network Telephone Corporation
815 South Palafox Street
Pensacola, FL 32501

Matthew Feil
Florida Digital Network Inc.
390 N. Orange Avenue
Suite 2000
Orlando, FL 32801

Tracy Hatch
AT&T
101 N. Monroe, Suite 700
Tallahassee, FL 32301