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September 25, 2003

Ms. Blanca S. Bayo, Director
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

RECEIVED FPSC
SEP 25 PM 1:53
COMMISSION
CLERK

Re: Docket No. 030643-TP

Dear Ms. Bayo:

Enclosed please find an original and 15 copies of TCG's Request for Confidential Classification of Certain Information, including Attachment A, which I would ask that you file in the above-styled docket.

Also enclosed is an envelope marked "CONFIDENTIAL", which contains Attachment B to TCG's Request. Attachment B consists of a confidential (unredacted) copy of each page of Verizon's pleadings in which TCG's confidential information appears. Proprietary confidential business information has been highlighted in yellow on each page and referenced by number to the chart found in Attachment A.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance in handling this matter.

Sincerely,

Handwritten signature of Marsha E. Rule

Marsha E. Rule

RECEIVED & FILED

Handwritten initials 'th' over the stamp

FPSC-BUREAU OF RECORDS

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Enclosures

cc: All Parties of Record

cc:
conf
records

This confidentiality request was filed by or for a "telco" for DN 09214-03. 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

09213 SEP 25 8

FPSC-COMMISSION CLERK

FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida, Inc. (f/ka/ GTE)
Florida Inc.) against Teleport Communications)
Group, Inc. and TCG South Florida, for review) Docket No. 030643-TP
of a decision by The American Arbitration)
Association in Accordance with Attachment 1) Filed: 09/25/03
Section 11.2 (a) of the Interconnection Agreement)
between GTE Florida Inc. and TCG South Florida)
_____)

**TELEPORT COMMUNICATION GROUP, INC. AND
TCG SOUTH FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF CERTAIN INFORMATION**

Teleport Communications Group Inc. and TCG South Florida (collectively, "TCG") pursuant to Rule 25-22.006, Florida Administrative Code, hereby file this Request for Specified Confidential Classification and state the following:

1. On September 5, 2003, Verizon Florida Inc. ("Verizon") re-filed its Petition, supporting attachments, and Opposition to TCG's Motion to Dismiss herein. Pursuant to direction by Commission staff, Verizon redacted all information that either Verizon or TCG considers confidential. TCG hereby requests confidential classification of TCG's confidential and proprietary business information found in Verizon's pleadings.¹ As shown below, such information is confidential and proprietary pursuant to Florida law, and the release of such information could cause competitive harm to TCG.

2. Attachment A to TCG's Request for Confidential Classification is a chart that identifies and locates each item of information in Verizon's pleadings that TCG has designated as confidential, and explains why each item is confidential.

¹ Verizon filed a broad request for confidential classification that encompasses entire documents, some of which contain TCG's confidential information. TCG's Request covers materials in some documents for which Verizon has requested confidential classification because TCG objected to Verizon's broad claims of confidentiality.

DOCUMENT NUMBER - DATE

09213 SEP 25 8

FPSC-COMMISSION CLERK

3. Verizon has already filed confidential and public versions of each document that includes TCG's confidential information. However, for ease of reference, TCG has provided as Attachment B a confidential (unredacted) copy of the specific page or pages in each document upon which TCG's confidential information appears. Confidential information on each page is highlighted in yellow and referenced by number to the chart found in Attachment A.

4. Public disclosure of the confidential business information identified in Attachment A would impair TCG's competitive business and would cause harm to TCG's business operations. TCG has treated and intends to continue to treat such information as private, and this information has not been generally disclosed. Such information therefore should be classified as confidential business information pursuant to Section 364.183(3)(e), Florida Statutes, and should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

WHEREFORE, TCG respectfully requests that the Commission enter an order declaring the above-referenced information to be confidential proprietary business information that is not subject to public disclosure.

Respectfully submitted,



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Attorneys for Teleport Communications
Group, Inc. and TCG South Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a copy of the foregoing Request and Attachment A was furnished by U.S. Mail this 25th day of September, 2003, to the following:

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Florida Public Service Commission
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MARSHA E. RULE, ESQ.

ATTACHMENT A

TCG's Request for Confidential Classification

No.	DOCUMENT	LOCATION	EXPLANATION
1.	Verizon Petition	Page 2, line 4	A
2.		Page 2, line 17	A
3.		Page 11, paragraph 17, line 7	A
4.		Page 11, paragraph 17, line 8	A
5.		Page 11, paragraph 17, line 9	A
6.	Verizon Att. B	Page 13, response to Interrogatory No. 25	C
7.	Verizon Att. C	Last page, paragraph 16	B
8.		Last page, paragraph 17	B
9.	Verizon Att. F	Page 5, line 7	A
10.	Verizon Att. H	All pages except the first two	D, A
11.	Verizon Att. N	Page 27, line 3	B
12.		Page 27, line 8	B
13.		Att. G, last page, paragraph 16	B
14.		Att. G, last page, paragraph 17	B
15.	Verizon Att. O	Page 162, lines 19-25	A
16.		Page 163, line 1	A
17.		Page 167, line 17	A
18.		Page 167, lines 18-19	C
19.		Page 167, line 24	C
20.		Page 168, line 4	C
21.		Page 168, line 7	C
22.		Page 168, line 17	C
23.		Page 168, line 18	C
24.		Page 169, line 4	B
25.		Page 171, line 8	C
26.		Page 178, lines 3-5	D
27.		Page 178, lines 21-22	B
28.		Page 178, line 23	B
29.		Page 179, lines 2-3	B
30.		Page 180, line 1	C
31.		Page 180, line 4	C
32.		Page 208, line 25	B

33.		Page 209, line 25	A
34.		Page 210, lines 1-2	A
35.		Page 210, lines 3-4	A
36.		Entire index	E
37.	Verizon Att. Q	Page 3, line 35	C
38.		Page 3, footnote 2	C
39.	Exhibit to Verizon Opposition to TCG's Motion to Dismiss	Letter dated June 20, 2003, TCG claim amount	C
40.		Attachment to above letter, first page, TCG claim amount	C
41.		Attachment to above letter, second page, TCG claim amount	C
42.		Final Award of Arbitrator, page 3, line 35	C
43.		Final Award of Arbitrator, page 3, footnote 2	C

Explanation A: This information relates to competitive interests, the disclosure of which would impair the competitive business interests of TCG. Specifically, this information relates to the number, type, and mix of telephone numbers assigned by TCG to its customers. Such information is proprietary and confidential. TCG has treated and intends to continue to treat this information as private. It has not been publicly disclosed, and was only disclosed to Verizon by order of the Arbitrator in the prior arbitration, and pursuant to a strict confidentiality agreement. Public disclosure of this information would provide TCG's competitors and potential competitors with the advantage of knowing TCG's specific business strategies and the relative success or failure of such strategies, and would be valuable to such competitors in formulating strategies for entry, marketing, and overall business strategy. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

Explanation B: This information relates to competitive interests, the disclosure of which would impair the competitive business interests of TCG. Specifically, this information discloses the volume and/or percentage of certain types of telecommunications traffic to TCG's customers. Such information is proprietary and confidential. TCG has treated and intends to continue to treat this information as private. It has not been publicly disclosed, and was only disclosed to Verizon in private, inter-company billings. Public disclosure of this information would provide TCG's competitors and potential competitors with valuable information regarding TCG's specific business strategies and the relative success or failure of such strategies, and would aid competitors in deriving information regarding TCG's market share. This information therefore would be valuable to such competitors in formulating strategies for entry, marketing, and overall business strategy. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

Explanation C: This information relates to competitive interests, the disclosure of which would impair the competitive business interests of TCG. Specifically, this information discloses the

dollar amount and/or volume of TCG's billings attributable to certain types of telecommunications traffic. Such information is proprietary and confidential. TCG has treated and intends to continue to treat this information as private. It has not been publicly disclosed, and was derived from private, inter-company billings in connection with the parties' confidential arbitration. Public disclosure of this information would provide TCG's competitors and potential competitors with valuable information regarding TCG's market share, specific business strategies and the relative success or failure of such strategies, and would aid competitors in deriving information regarding TCG's market share. This information therefore would be valuable to such competitors in formulating strategies for entry, marketing, and overall business strategy. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes.

Explanation D: This information relates to competitive interests, the disclosure of which would impair the competitive business interests of TCG. Specifically, the information identifies customer-specific account information such as the type of service associated with specific customers who are identified by name, telephone number or street address. Such information is proprietary and confidential. TCG has treated and intends to continue to treat this information as private. It has not been publicly disclosed, and was only disclosed to Verizon by order of the Arbitrator in the prior arbitration, and pursuant to a strict confidentiality agreement. Public disclosure of this information would provide TCG's competitors and potential competitors with the advantage of knowing TCG's specific customers, and the types of services those customers may use, and therefore is valuable to such competitors. Therefore, this information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(e), Florida Statutes and Section 364.24(2), Florida Statutes.

Explanation E: TCG also requests confidential classification of the entire index to Verizon's Attachment O. The index is a listing of every numerical value and all but a very few words found in Attachment O, along with the page and line number at which they appear. Publication of the index would allow reconstruction of every piece of information in Attachment O for which TCG has requested confidential classification. Simply redacting the confidential words and numbers from the index will not adequately protect the confidential information; the index is arranged in numerical and alphabetical order, so one could determine the redacted term by reviewing the words or numbers preceding and following the redacted term.