

ORIGINAL



Richard A. 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

September 29, 2003

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

RECEIVED FPSC  
SEP 29 AM 9:52  
COMMISSION  
CLERK

Re: Docket No. 030867-TL  
Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic  
Local Telecommunications Rates in Accordance with Florida Statutes, Section  
364.164

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s  
Request for Confidential Classification and Motion for Protective Order in connection  
with Commission Staff's billing units audit in the above matter. 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 A. Chapkis*

Richard Chapkis

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CMP \_\_\_\_\_ RC:tas  
COM \_\_\_\_\_ Enclosures  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Verizon Florida Inc. to Reform )  
Its Intrastate Network Access and Basic Local )  
Telecommunications Rates in Accordance with )  
Florida Statutes, Section 364.164 )  
\_\_\_\_\_ )

Docket No. 030867-TL  
Filed: September 29, 2003

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

Under Commission Rule 25-22.006, F.A.C., Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in the workpapers prepared by Commission Staff during its billing units audit (Audit Control No. 03-247-2-1) in this proceeding. The workpapers (Summary 3/5, Summary 4/5 and Summary 5/5) relate to confidential information on page 12 of the Direct Testimony of Orville D. Fulp and Exhibits ODF-1 and ODF-2 filed in this matter. Verizon filed its Request for Confidential Classification and Motion for Protective order in connection with Mr. Fulp's testimony/exhibits on August 27, 2003.

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

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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 workpapers 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 September 29, 2003.

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

Attorney for Verizon Florida Inc.

**SPECIFIED  
CONFIDENTIAL**

Calculation of Interstate ARPM

Interstate Revenues - Per Testimony

**Less:**

Dedicated Tandem Trunk - DS1

**Plus:**

Dedicated Tandem Trunk - DS1

Total Revenues \_\_\_\_\_

Total MOUs

ATS ARPM-Interstate  
=====

Calculation of Intrastate ARPM

**REDACTED**

*Intrastate*  
Interstate Revenues - Per Testimony

**Less:**

Tandem Switching Rate

**Plus:**

Tandem Switching Rate

**Less:**

DS1 Additional Systems

DS1 Additional Systems

Total Revenues \_\_\_\_\_

Total MOUs

ATS ARPM-Intrastate  
=====

**CONFIDENTIAL**

*Summary 3/5*

Calculation of PICC Equivalent ARPM and Required Access Revenue Reduction

**SPECIFIED  
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	<u>Intrastate Demand</u>	<u>Interstate Rates</u>	<u>Per Audit Using Co Document</u>	<u>Per Exh ODF-1</u>	<u>Difference</u>
Multiline Business		\$3.20			
ISDN - PRI		\$16.00			
Centrex		\$0.36			
Per Audit	=====				
		<b>PICC Revenues</b>			
		<b>Intrastate Demand</b>			
		<b>PICC Equiv ARPM</b>			
		<b>Interstate ATS ARPM</b>			
		<b>PICC Equiv ARPM</b>			
		<b>Composite ARPM</b>			
		<b>Intrastate ARPM</b>			
		<b>Composite ARPM</b>			
		<b>Difference</b>			
		<b>Intrastate Demand</b>			
		<b>Required Access Revenue Reduc</b>	=====	=====	=====

**REDACTED**

**CONFIDENTIAL**

*Summary 4/5*

PICC Usage Units

**SPECIFIED  
CONFIDENTIAL**

Per Audit

Multiline Business  
ISDN - PRI  
Centrex

\_\_\_\_\_

**REDACTED**

Per Testimony

Multiline Business  
ISDN - PRI  
Centrex

\_\_\_\_\_

=====

Difference

Multiline Business	\$3.20
ISDN - PRI	\$16
Centrex	\$0.36

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\_\_\_\_\_

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**CONFIDENTIAL**

*Summary 7/7*

**EXHIBIT C**

<b>DOCUMENT</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
FPSC Audit Workpapers: Summary 3/5 Summary 4/5 Summary 5/5	All highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information would cause harm to Verizon by giving its competitors an unfair advantage in developing, pricing and marketing their services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in Docket No. 030867-TL were sent via electronic mail and U.S. mail on September 29, 2003 to:

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

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

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

Michael Gross  
Florida Cable Telecomm. Assn.  
246 East 6<sup>th</sup> Avenue  
Tallahassee, FL 32303

Susan Masterton  
Charles Rehwinkel  
Sprint-Florida  
1313 Blairstone Road  
MC FLTLHO0107  
Tallahassee, FL 32301

Donna McNulty  
MCI WorldCom, Inc.  
1203 Governors Square Blvd.  
Suite 201  
Tallahassee, FL 32301-2960

Charles J. Beck  
H. F. Mann  
Office of Public Counsel  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400

John Fons  
Ausley & McMullen, P.A.  
227 South Calhoun Street  
Tallahassee, FL 32302



Michael B. Twomey  
AARP  
8903 Crawfordsville Road  
Tallahassee, FL 32305

Mark Cooper  
AARP  
504 Highgate Terrace  
Silver Spring, MD 20904

Richard A. Chapkis  
Richard Chapkis