

ORIGINAL



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September 30, 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

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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 the company's revised response to Citizens' Third Request for Production of
Documents (No. 51) 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

RECEIVED & FILED

lh

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cc: Corp records

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STATE DISTRIBUION CENTER

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FPSC-COMMISSION CLERK

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.
Filed: September 30, 2003

**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 revised response to Citizens' Third Request for Production of Documents (No. 51) 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 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

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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 September 30, 2003.

By: Richard A. Chapkis
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(813) 483-1256

Attorney for Verizon Florida Inc.

Verizon Florida
 Competitive Profile
 As of 2/28/03 *

Exchange	Retail		Resale		UNE-P		E911		UNE-Loop Bus/Res
	Residence	Business	Residence	Business	Residence	Business	Residence	Business	
BARTOW									
BRADENTON									
CLEARWATER									
ENGLEWOOD									
FROSTPROOF									
HAINES CITY									
HUDSON									
INDIAN LAKE									
LAKE WALES									
LAKELAND					REDACTED				
MULBERRY									
MYAKKA									
NEW PORT RICHEY									
NORTH PORT									
PALMETTO									
PLANT CITY									
POLK CITY									
SARASOTA									
ST. PETERSBURG									
TAMPA CENTRAL									
TAMPA EAST									
TAMPA NORTH									
TAMPA SOUTH									
TAMPA WEST									
TARPON SPRINGS									
VENICE									
WINTER HAVEN									
ZEPHYRHILLS									

E911 data was captured on 5/1/2003, all other data is for month ending 2/28/2003.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment POD 51 Bates No. 224	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 on September 30, 2003 and overnight delivery on September 29, 2003 to:

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