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October 28, 2003

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COMMISSION
CLERK

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

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 second supplemental responses to Citizens' First Set of Requests
for Production of Documents (specifically, nos. 4,5,6,20,21,22) 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

RC:tas

Enclosures

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

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DOCUMENT NUMBER-DATE

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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. 030867-TL
Filed: October 28, 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 second supplemental responses to Citizens' First Set of Requests for Production of Documents (specifically, nos. 4,5,6,20,21,22) 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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FPSC-COMMUNICATIONS

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 October 28, 2003.

By: Richard A. Chapkis
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Attorney for Verizon Florida Inc.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachment POD 4 (Bates Nos. 5-24)	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.
Attachment POD 5 (Bates Nos. 329-489)	All highlighted text	
Attachment POD 6 (Bates Nos. 329-489; 5-24)	All highlighted text	
Attachment POD 20 (Bates Nos. 329-489)	All highlighted text	
Attachment POD 21 (Bates Nos. 5-24)	All highlighted text	
Attachment POD 22 (Bates Nos. 5-24)	All highlighted text	

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 October 28, 2003 to:

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