

ORIGINAL



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November 17, 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  
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COMMISSION  
CLERK

Re: Docket No. 030851-TP  
Implementation of requirements arising from Federal Communications  
Commission's triennial UNE Review: Local Circuit Switching for Mass Market  
Customers

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 responses to FCCA's First Set of Interrogatories (Nos. 1-18) 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 A. Chapkis

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This confidentiality request was filed by or for a "telco" for DN 11588-03. 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  
11588 NOV 18 03  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Implementation of requirements arising ) Docket No. 030851-TP  
from Federal Communications Commission's ) Filed: November 17, 2003  
Triennial UNE review: Local Circuit Switching )  
for Mass Market Customers. )  
\_\_\_\_\_ )

**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 Company's responses to FCCA's First Set of Interrogatories (specifically, nos. 4, 5, 9 and 14) in this proceeding.

All of the information for which Verizon seeks confidential treatment falls within Florida Statutes section 364.183(3), which defines "proprietary confidential business information" as:

Information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public.

Florida Statutes section 364.183(3)(a) expressly provides that "trade secrets" fall within the definition of "proprietary confidential business information." Florida Statutes section 364.183(3)(e), further provides that "proprietary confidential business information" includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

DOCUMENT NUMBER - DATE

11588 NOV 18 03

FPSC-COMMISSION CLERK

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. Accordingly, Verizon respectfully requests that the Commission classify the identified documents as confidential and enter an appropriate protective order.

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 November 17, 2003.

By: Richard A. Chapkis  
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**EXHIBIT C**

<b>DOCUMENT</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
Attachment INT 4 (Bates Nos. VZ 985 - VZ 994 )	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 INT 5 (Bates Nos. VZ 995 - VZ 996)	All highlighted text	
Attachment INT 9 (Bates Nos. VZ 1000 - VZ 1001)	All highlighted text	
Response to Interrogatory No. 14	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. 030851-TP were sent via electronic mail and overnight delivery on November 17, 2003 to:

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