

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

November 21, 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

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 fifteen copies of Verizon Florida Inc.'s
Request for Confidential Classification and Motion for Protective Order in connection
with the company's supplemental responses to Citizens' Second Set of Interrogatories
and Second Request for Production of Documents 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
- COMP
- COM
- CTR
- ECR
- GCL
- OPC
- MMS
- SEC
- OTH

*LCC
conf
records*

DOCUMENT NUMBER-DATE

11931 NOV 24 8

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: November 21, 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 company's supplemental responses to Citizens' Second Set of Interrogatories (Nos. 24-39) and Second Request for Production of Documents (Nos. 37-40) in this proceeding.

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.

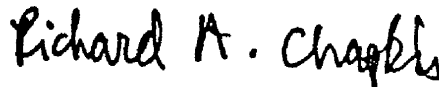
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FPC- COMMISSION CLERK

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 (including a confidential diskette) 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 21, 2003.

By:



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

Attorney for Verizon Florida Inc.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Attachments POD 37 and POD 40 - on diskette Bates No. 501	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.
Supplemental Response to Interrogatory No. 29	All highlighted text	
Supplemental Response to Interrogatory No. 32	All highlighted text	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and overnight delivery on November 21, 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 6th 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

De O'Roark
MCI
6 Concourse Parkway
Suite 600
Atlanta, GA 30328

George Meros
Gray Harris & Robinson
301 S. Bronough Street
Suite 600
Tallahassee, FL 32301

Floyd Self
Messer Law Firm
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

John Feehan
Knology, Inc.
1241 O.G. Skinner Drive
West Point, GA 31833

Richard A. Chapkis

Richard Chapkis