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December 4, 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
03 DEC -4 PM 3:48
COMMISSION
CLERK

Re: Docket Nos. 030851-TP and 030852-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 Direct Testimony/Exhibits in the above matter. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 202-663-6380.

Sincerely,


Catherine Kane Ronis

This confidentiality request was filed by or for a "telco" for DN 12436-03. 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.

- AUS
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1 each dkt
1 cc: conf records

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FPSC-BUREAU OF RECORDS
Request/Motion
DOCUMENT NUMBER-DATE

12435 DEC-4 03

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Completed
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DOCUMENT NUMBER-DATE
12436 DEC-4 03
12437 DEC-4 03
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements) Docket Nos. 030851-TP
arising from the Federal Communications) and 030852-TP
Commission's triennial UNE Review:) Filed: December 4, 2003
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, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in the Direct Testimony and Exhibits 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

DOCUMENT NUMBER - DATE

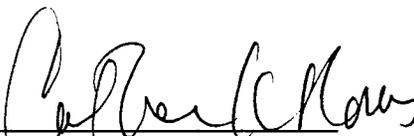
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FPSC-COMMISSION CLERK

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 December 4, 2003.

By: 

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Attorneys for Verizon Florida Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on December 4, 2003 and overnight delivery on December 4, 2003 to:

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Catherine Kane Ronis

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Direct Testimony of William E. Taylor		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.
Page 21	Lines 3-7	
Page 23	Line 21	
Page 36	Line 6	
Page 37	Lines 5, 8, 13, 15, 18	
Page 38	Lines 13, 16	
Page 39	Lines 3, 7, 14	
Page 40	Lines 8, 9	
Exhibits		
Exhibit No. III-A	All	
Exhibit IV-A	All	
Exhibit IV-B	All	
Exhibit No. WET-III	All	
Exhibit No. WET IV	All	
Exhibit No. WET V	All	
Exhibit No. WET VI	All	
Exhibit No. WET VII	All	