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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
DEC-4 PM 3:41
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 Exhibit ODF-2 to the Direct Testimony of Orville D. Fulp 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 813-483-1256.

Sincerely,

Richard A. Chapkis

Richard A. Chapkis

RAC:tas
Enclosures

This confidentiality request was filed by or
for a "telco" for DN 12440-03. 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.

Restricted
DOCUMENT NUMBER-DATE
12441 DEC-4 03

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

cc: conf records

RECEIVED & FILED

Max
FPSC-BUREAU OF RECORDS

Request/Motion Confidential
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE

12439 DEC-4 03 12440 DEC-4 03

FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements) Docket No. 030851-TP
arising from the Federal Communications) Filed: December 4, 2003
Commission's 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, Verizon Florida Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in Exhibit ODF-2 to the Direct Testimony of Orville D. Fulp 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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12439 DEC-4-8

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: Richard A. Chapkis
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Tampa, FL 33602
(813) 483-1256

Attorney for Verizon Florida Inc.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Exhibit ODF-2 to the Direct Testimony of Orville D. Fulp	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 the foregoing were sent via electronic mail and overnight delivery on December 4, 2003 to:

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Tallahassee, FL 32399-0850

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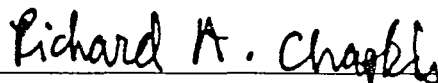
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