

ORIGINAL



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January 7, 2004

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  
04 JAN - 8 AM 11: 11  
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 supplemental responses to AT&T's First Set of Interrogatories 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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*Oh*  
FPC BUREAU OF RECORDS

RAC:tas  
Enclosures

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

*conf records*

This confidentiality request was filed by or  
for a "telco" for DN 06 353-04 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.

*(See 10462-03)*

DOCUMENT NUMBER-DATE  
**00352 JAN - 8 04**  
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: January 7, 2004  
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 supplemental responses to AT&T's First Set of Interrogatories (specifically, Nos. 28, 40(a)(e), 61, 64(c)(d), 88(d)(e) and 105) 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 provide 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

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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. 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 January 7, 2004.

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

**EXHIBIT C**

<b>DOCUMENT</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
Supplemental Response to INT 28	All highlighted text	This is competitively sensitive, confidential business information of Verizon that identifies the specific Verizon central offices that are manned versus those that are unmanned. Verizon maintains this information as confidential and disclosure of this information would cause harm to Verizon and the ratepayers, by giving rise to significant security concerns. Such disclosure is particularly unfair to Verizon since it does not have access to this information from its competitors.
Attachment INT 40a,e (Bates Nos. VZ 1053 - VZ 1060)	All highlighted text	
Attachment INT 61 (Bates Nos. VA 1061 - VZ 1062)	All highlighted text	
Attachment 1-INT 64c,d and 105 (Bates Nos. VZ 1063 - VZ 1073)	All highlighted text	
Attachment 2-INT 64c,d and 105 (Bates Nos. VA 1074 - VZ 1116)	All highlighted text	
Attachment 3-INT 64c,d and 105 (Bates No. VZ 1117 - diskette)	All highlighted text	
Attachment 88d,e (Bates Nos. VZ 1118 - VZ 1119)	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 U. S. mail on January 7, 2004 to:

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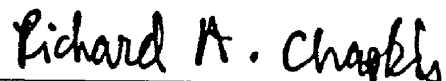
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