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January 9, 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

6 PM

Re: Docket No. 030852-TP Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3 and Dark Fiber Loops, and Route-Specific Review for DS1, DS3 and Dark Fiber Transport

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Florida Inc.'s Request for Confidential Classification in connection with Pages 12 and 14 and Exhibits F.1-F.5 of the Joint Supplemental Direct Testimony of Orville D. Fulp and John White 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.

RECEIVED & FILED

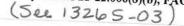
Sincerely,

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Richard A. Chapkis

RAC:tas AUS Enclosures CAF CMP COM CTR ECR GCL OPC MMS SEC OTHICON

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



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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail

and U.S. mail on January 9, 2004 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

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> **Bo Russell** Nuvox Communications Inc. 301 North Main Street Greenville, SC 29601

Thomas M. Koutsky Z-Tel Communications, Inc. 1200 19th Street, N.W., Suite 500 Washington, DC 20036

Richard A. Chapkin

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Implementation of requirements arising from Federal Communications Commission's triennial UNE Review: Location-Specific Review for DS1, DS3, and Dark Fiber Loops and Route-Specific Review for DS1, DS3 and Dark Fiber Transport Docket No. 030852-TP Filed: January 9, 2004

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 Joint Supplemental Direct Testimony of Orville D. Fulp and John White (pages 12 and 14) and Exhibits F.1 - F.5 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 will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

One highlighted copy (including a confidential CD) of the confidential information is attached to the original of this Request as Exhibit A. Two redacted copies (excluding the CD) 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 9, 2004.

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By:

Chepkin ichard N.

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

Attorney for Verizon Florida Inc.

EXHIBIT C

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DOCUMENT	LINE(S)/COLUMN(S)	REASON
Joint Supplemental Direct Testimony of Orville D. Fulp and John White Pages 12 and 14	All highlighted text	This is competitively sensitive, confidential business information of Verizon that specifically identifies CLECs that maintain collocation facilities in Verizon
Exhibits F.1 - F.5 to the Joint Supplemental Direct Testimony of Orville D. Fulp and John White	All highlighted text	central offices and/or provide wholesale services in Florida.