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January 26, 2004

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

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COMMISSION  
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Re: Docket No. 981834-TP  
Petition of Competitive Carriers for Commission Action to Support Local  
Competition in BellSouth Telecommunications Inc.'s Service Territory

Docket No. 990321-TP  
Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic  
investigation to ensure that BellSouth Telecommunications, Inc., Sprint-Florida,  
Incorporated, and GTE Florida Incorporated comply with obligation to provide  
alternative local exchange carriers with flexible, timely, and cost-efficient  
physical collocation

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 Covad's Second Set of Interrogatories  
(specifically, Nos. 13-16) and Second Request for Production of Documents (No. 2) in  
the above matters. 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*

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FPSC-BUREAU OF RECORDS

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission ) Docket No. 981834-TP  
Action to Support Local Competition in BellSouth ) Filed: January 26, 2004  
Telecommunications Inc.'s Service Territory )  
\_\_\_\_\_)  
Petition of ACI Corp. d/b/a Accelerated Connections, ) Docket No. 990321-TP  
Inc. for generic investigation to ensure that BellSouth )  
Telecommunications, Inc., Sprint-Florida, )  
Incorporated, and GTE Florida Incorporated comply )  
with obligation to provide alternative local exchange )  
carriers with flexible, timely, and cost-efficient )  
physical collocation )  
\_\_\_\_\_)

**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 its supplemental responses to Covad's Second Set of Interrogatories (specifically, Nos. 13-16) and Second Request for Production of Documents (No. 2) 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

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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 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 26, 2004.

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

**EXHIBIT C**

<b>PAGE NOS.</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
Responses to Interrogatory Nos. 13 and 15	All highlighted text	<p>The information contained in these files constitutes and is derived from algorithms and/or contractual prices provided to Verizon from third party vendors. Verizon's contractual obligations to those parties include the obligation not to disclose or distribute such proprietary or confidential information. Aside from violating contract terms, disclosure of this information would harm Verizon's future ability to contract for goods and/or services on favorable terms.</p> <p>This information contains the detailed cost components underlying discrete basic collocation design and function. Disclosure of such detailed costs for such small pieces of collocation design would give competitors an advantage in designing their networks and in competing against Verizon in the most efficient manner. The fact that Verizon cannot obtain such knowledge about its competitors exacerbates the unfairness of disclosing this detailed cost information.</p>
Attachment Covad POD 2(a) - Bates Nos. 690-693	All highlighted text	
Attachment Covad POD 2(b) – Bates Nos. 694-696	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 Nos. 981834-TP and 990321-TP were sent via electronic mail and U.S. mail on January 26, 2004 to the parties on the attached list.

*Richard A. Chapkis*

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