

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of requirements )  
arising from the Federal Communications )  
Commission's triennial UNE Review: )  
Local Circuit Switching for Mass Market )  
Customers )

Docket No. 030851-TP  
Filed: February 17, 2004

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**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 Amended Exhibit III-A: Wholesale Non-Recurring Study for Hot Cuts to the Direct Testimony of Verizon's Hot Cut Panel 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.

- 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 02239-04. 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 12436-09)

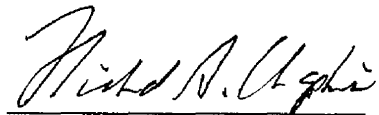
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While a ruling on this request is pending, Verizon understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

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 February 17, 2004.

By:



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**EXHIBIT C**

<b>DOCUMENT</b>	<b>LINE(S)/COLUMN(S)</b>	<b>REASON</b>
Amended Exhibit III-A to the Direct Testimony of Verizon's Hot Cut Panel	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.

The following amendments were made to the Verizon Florida Hot Cut Panel Direct Testimony filed on December 4, 2003:

- DBS Tab, Lines 9 & 16, 'Travel to Remote' changed from 7.94 to 7.31;
- DBS Tab, Line 10, 'Prewire Lines' changed from 5.01 to 9.02, which represents an 80% probability that 2 techs worked on the order;
- DBS Tab, Line 36, 'Create and Distribute Project Spreadsheet' changed from .32 to N/A;
- FCT Tab, 'Common Overhead' changed from .101574285 to .097074545
- LLR Tab, 'Directly Assigned' changed to 'Fully Assigned';
- LLR Tab, 2002 'RCCC' rate changed from \$37.07 to \$44.90;
- LLR Tab, 2002 'APC' rate changed from \$37.07 to \$32.85;
- LLR Tab, 2002 'RCMAC' rate changed from \$37.07 to \$44.90;
- LLR Tab, 2002 '211 Switching' rate changed from \$41.72 to \$51.25;
- LLR Tab, 2002 '202 I & R/Maint. Spicer' rate changed from \$41.72 to \$47.41;
- LLR Tab, 2002 '221 PBX Instal & Maint.' Rate changed from \$41.72 to \$58.08;
- LLR Tab, Average rate for 'Field Installation' changed from \$41.72 to \$52.75;
- COF-1..10 Tab, 'Travel to Remote Central Office' Probability of Occurrence changed from 100% to 8.88%;
- ORD-1..9 Tab, 'Project Spreadsheet Update/Input' changed from 13.20 to 0;
- FDS Tab, FDS in 'Source' column changed to 'FLD-1 & FLD-2'.