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January 19, 2006

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

060158-TL

Re: Safeguarding Customer Information – Methods and Procedures

Dear Ms. Bayo:

In response to Staff's request for information, Verizon Florida Inc. (Verizon) is providing a copy of its "Safeguarding Customer Information" Methods & Procedures and a copy of a Fraud Alert bulletin that was distributed to all employees. Verizon considers all of the information provided in this response to be proprietary and is filing it under a claim of confidential treatment pursuant to Section 364.183(1), Florida Statutes and Rule 25-22.006(5), Florida Administrative Code. In that regard, attached is a sealed envelope containing one copy of the response. All of which is considered confidential and proprietary.

Verizon considers the information confidential because, if it were publicly available, it would reveal Verizon's internal processes and procedures and thus potentially aid unscrupulous data dealers in their attempts to gain unauthorized access to information through social engineering tactics.

Verizon understands this information will be protected from public disclosure until returned to the Company. Pursuant to Section 364.183(4), Staff may retain this information for as long as is necessary for the Commission to conduct its business.

Verizon recognizes the importance of protecting its customers' privacy, and customer privacy is a priority for Verizon. Verizon continually reviews its processes and procedures to ensure compliance with state and federal rules and laws and to recognize changes in technology as well as the evolving tactics of criminals seeking access to customer account information.

All Verizon employees are instructed on their responsibility to safeguard customer information. This responsibility is outlined in the employee Code of Business Conduct, is

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reinforced in procedures and refresher training, and compliance is ensured through routine service quality observation.

Currently Verizon relies on information contained on the customer bill as a means of authenticating the customer as the party of record (reference page 4 of the M&P). Verizon notified Customers of this method of verification on a bill message appearing on their July 2005 bills.

Verizon also has procedures in place for Verizon employees to verify the status of other purported employees before discussing account information (reference page 12 of the M&P).

Employees are required to adhere to company policies and procedures, including adequately validating the identity of a caller prior to releasing customer specific information. Employees who violate company standards may be disciplined with sanctions up to and including dismissal.

As recently as Tuesday, January 17, 2006, a bulletin was distributed to all employees informing them that scammers may have been attempting to gain customer information under false pretenses and that employees should be especially vigilant and diligent in following verification procedures.

Additionally, Verizon has strong safeguards in place to ensure a customer's privacy when establishing and using an on-line account at Verizon.Com. To view the process to register an account on Verizon.Com, please view [www.verizon.com](http://www.verizon.com).

Sincerely,



David M. Christian

c: Rick Moses (w/redacted copy)

Verizon Florida Inc.

January 19, 2006

**CONFIDENTIAL ATTACHMENT NO. 1**

**Safeguarding Customer Information  
Methods and Procedures**

**ENTIRE DOCUMENT, CONSISTING OF 15 PAGES,  
IS CONFIDENTIAL**

Verizon Florida Inc.

January 19, 2006

**CONFIDENTIAL ATTACHMENT NO. 2**

**Verizon Employee Bulletin  
Fraud Alert: Scammers Attempting to Gain Customer  
Information**

**ENTIRE DOCUMENT, CONSISTING OF 1 PAGE,  
IS CONFIDENTIAL**