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May 10, 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

RECEIVED-PPSC
MAY 10 AM 9:40
COMMISSION
CLERK

Re: Docket No. 060042-TP
Complaint by Franklin Templeton Companies, LLC against Verizon Florida Inc.
for allegedly breaching telecommunications service agreement and violating
Section 364.051(5)(b), Florida Statutes, and Rule 25-4.110, Florida
Administrative Code

Dear Ms. Bayo:

Enclosed for filing are an original and 15 copies of Verizon Florida Inc.'s Request for Confidential Classification and Motion for Protective Order in connection with documents produced in response to Franklin Templeton Companies, LLC's First Request for Production of Documents 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,

Leigh A. Hyer

LAH:tas

Enclosures

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SCL _____
DPC _____
RCA _____
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SGA _____
SEC 1 _____
DTH Kim P. Lockard

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

04106 MAY 10 06

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint by Franklin Templeton
Companies, LLC against Verizon Florida Inc.
for allegedly breaching telecommunications
service agreement and violating Section
364.051(5)(b), Florida Statutes, and Rule
25-4.110, Florida Administrative Code

) Docket No. 060042-TP
) Filed: May 10, 2006
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**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 information contained in documents produced in response to Franklin Templeton Companies, LLC's First Request for Production of Documents 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 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

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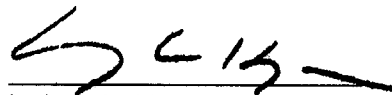
ensure success in competing with Verizon. This would afford them an unfair advantage while severely jeopardizing Verizon's competitive position. In a competitive business, any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot 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 information 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 copy of the confidential information is attached to the original of this Request as Exhibit A. Due to the nature and volume of the documents, redacted copies are not being provided. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on May 10, 2006.

By:



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Attorney for Verizon Florida Inc.

EXHIBIT C

| DOCUMENT | LINE(S)/COLUMN(S) | REASON |
|---|----------------------------------|--|
| <p>Documents consist of proprietary internal emails, correspondence, proprietary fiber layouts, network engineering work orders, project control memos, network service agreements and rate quotes. The following Bates stamped documents are considered to be confidential:</p> <p>VZ 1 - VZ 587 VZ 677 VZ 832 VZ 836 VZ 838 - VZ 954 VZ 956 - VZ 1186 VZ 1190 - VZ 1204 VZ 1225 - VZ 1231 VZ 1240 - VZ 1243 VZ 1245 - VZ 1263 VZ 1277 - VZ 1279 VZ 1281 - VZ 1283 VZ 1287 VZ 1294 - VZ 1303 VZ 1316 - VZ 1319 VZ 1324 - VZ 1339 VZ 1826 - VZ 1832</p> | <p>All text on all documents</p> | <p>This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information could give competitors an unfair advantage in developing their own competitive strategies by revealing Verizon's pricing and negotiating strategies and the layout of its network facilities.</p> |

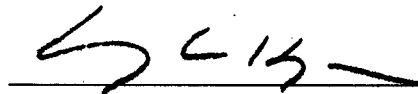
CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were sent via overnight mail(*) and/or U.S. mail(**) on May 10, 2006 to:

Staff Counsel (*)
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

William P. Cox (**)
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Sarasota, FL 34230-6948

Lawrence Chew (**)
Franklin Templeton Companies, LLC
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San Mateo, CA 94403



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