

ORIGINAL



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November 13, 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

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Re: Undocketed
MCI Communications Services, Inc. d/b/a Verizon Business Services
RAF January-June 2005 - RCA No. 05-244-4-2

Dear Ms. Bayo:

Enclosed for filing in the above matter are an original and 15 copies of Verizon Business Services' Request for Confidential Classification and Motion for Protective Order. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 770-284-5498.

Sincerely,

RL

CMP *Dulaney O'Roark*

COM _____
Dulaney L. O'Roark III

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[Signature]
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were sent via U.S. mail on November 13, 2006 to:

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

Denise Vandiver
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Iliana Piedra
Audit Manager
Florida Public Service Commission
3625 NW 82nd Avenue, Suite 400
Miami, FL 33166-7602

Dulany O'Roark *PH*

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: MCI Communications Services, Inc.) Undocketed
d/b/a Verizon Business Services) Filed: November 13, 2006
RAF January-June 2005--RCA No. 05-244-4-2)
_____)

**MCI COMMUNICATIONS SERVICES, INC. D/B/A VERIZON BUSINESS SERVICES'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, F.A.C., MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon Business") seeks confidential classification and a protective order for information contained in audit workpapers and materials produced by Verizon Business in response to RCA No. 05-244-4-2. A substantial portion of these work papers and Verizon Business materials consists of or was derived from highly sensitive, proprietary financial information requested by staff auditors during their regulatory assessment fee audit of Verizon Business.

All of the information for which Verizon Business 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.

DOCUMENT NUMBER-DATE

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Florida Statutes section 364.183(3)(a) expressly provides 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 the confidential information at issue, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon Business. This would afford them an unfair advantage while severely jeopardizing the competitive position of the company whose confidential information is disclosed. 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 Business respectfully requests that the Commission classify the identified information as confidential and enter an appropriate protective order.

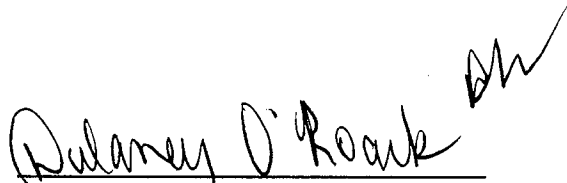
While a ruling on this request is pending, Verizon Business understands that the information at issue is exempt from Florida Statutes section 119.07(1) and Staff will accord it the stringent protection from disclosure required by Rule 25-22.006(3)(d).

In accordance with Rule 25-22.006(4), Verizon Business files herewith one set of the workpapers as to which it seeks confidential classification with the confidential portions highlighted, attached hereto as Exhibit A. Also included in Exhibit A are three computer discs as to which Verizon Business seeks confidential classification. Two sets of copies with the confidential portions redacted are attached hereto as Exhibit B.

Exhibit C lists the specific workpapers and contains justification of the confidentiality of the information at issue.

Respectfully submitted on November 13, 2006.

By:



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Attorney for Verizon Florida Inc.

EXHIBIT C
MCI COMMUNICATIONS SERVICES, INC. D/B/A VERIZON BUSINESS SERVICES
RAF JANUARY-JUNE 2005 – RCA NO. 05-244-4-2

WORKPAPER NO./ DESCRIPTION	NO. OF PAGES	REASON
41-1/1 – Company Reconciliation Schedule	1	The financial information in lines 4-9 of this document consists of competitively sensitive, confidential and proprietary Verizon Business financial data. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
41-1/2 – Tax Report	1	Substantially all of this document consists of competitively sensitive, confidential and proprietary Verizon Business financial data (or information derived from such data). This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
41-2/1 – Company Reconciliation Schedule	1	See response to 41-1/2.
41-2/2 – Tax Report	1	See response to 41-1/2
41-3/1 – Company Reconciliation Schedule	1	See response to 41-1/2.
41-3/2 – Tax Report	1	See response to 41-1/2
41-3/4 – SCA Calculation	2	See response to 41-1/2
41-3/4-1 – SCA Calculation Documentation	4	See response to 41-1/2
41-4/1 – Billing Systems	2	Substantially all of this document provides proprietary descriptions of Verizon Business's accounting systems. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
41-4/2 – Tax Charge Groups	2	Substantially all of this document provides Verizon Business's proprietary accounting information. This information has been

		confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
41-4/3 – Regulatory Exclusions	1	See response to 41-1/2
41-5/1 – Access Revenue	1	See response to 41-1/2
41-5/1-1 – Access Revenue	10	See response to 41-1/2
41-5/1-2 – Access Revenue	1	See response to 41-1/2
41-5/1-3 – Access Revenue	7	See response to 41-1/2
42-2 – Intrastate calculation	7	See response to 41-1/2
42-2/1-1 – Gross revenues to filing	1	See response to 41-1/2
42-2/1-2 – Gross revenues to filing	1	See response to 41-1/2
42-2/1-3 – Gross Revenues to filing	1	See response to 41-1/2
42-3 – Tax Report Reconciliation	1	See response to 41-1/2
42-3/1 – Tax Report	3	See response to 41-1/2
42-3/2 – Reconciliation	3	Substantially all of pages 2 and 3 of this document consist of competitively sensitive, confidential and proprietary Verizon Business financial data (or information derived from such data). This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
42-4/1 – Revenue tax allocation	1	The Verizon Business response at lines 15-32 provides Verizon Business's proprietary accounting information. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
43-1 – June 2005 reconciliation	1	See response to 41-1/2
43-1/1 – Billing platform rec.	6	See response to 41-1/2
43-1/2 – Billing platform rec.	1	See response to 41-1/2
43-1/3 – Billing platform rec.	1	See response to 41-1/2
43-1/4 – Billing platform rec.	1	See response to 41-1/2
43-1/5 – Billing platform rec.	3	See response to 41-1/2
43-1/6 – Billing platform rec.	1	See response to 41-1/2
43-1/7 – Billing platform rec.	1	See response to 41-1/2
43-1/8 – Billing platform rec.	1	See response to 41-1/2
43-1/9 – Billing platform rec.	1	See response to 41-1/2

43-2 – January 2005 reconciliation	1	See response to 41-1/2
43-2/1 – Billing platform rec.	9	See response to 41-1/2
43-2/2 – Billing platform rec.	1	See response to 41-1/2
43-2/3 – Billing platform rec.	1	See response to 41-1/2
43-2/4 – Billing platform rec.	3	See response to 41-1/2
43-2/5 – Billing platform rec.	1	See response to 41-1/2
43-2/6 – Billing platform rec.	1	See response to 41-1/2
43-2/7 – Billing platform rec.	1	See response to 41-1/2
43-2/8 – Billing platform rec.	1	See response to 41-1/2
43-3 – GL files reconciliation	1	See response to 41-1/2
43-3/1 – Prod. Cons. File	2	See response to 41-1/2
43-3/1-1 – Period file	4	See response to 41-1/2
43-3/1-2 – Company code dom. File	4	See response to 41-1/2
43-3/2 – Company code total file	26	See response to 41-1/2
43-3/2-1 – Period total file	29	See response to 41-1/2
44-1 – Income Statement	12	Substantially all of pages 1 and 5-12 consist of competitively sensitive, confidential and proprietary Verizon Business financial data (or information derived from such data). This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
44-1/1 – Account 64000007	12	See response to 41-1/2
44-1/2 – Account 64000357	8	See response to 41-1/2
45-1 – Amounts paid to others allocation	1	See response to 41-1/2
45-1/1 – Intra recurring/usage	29	See response to 41-1/2
45-1/1-1 – Sample	3	See response to 41-1/2
45-1/1-1/1 – Sample	1	The Verizon Business response at lines 6-32 provides Verizon Business's proprietary accounting information. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
45-1/2 – Inter recurring/usage	28	See response to 41-1/2
45-1/3 – Local intra	1	See response to 41-1/2
45-1/3-1 – Sample	1	See response to 41-1/2
45-1/3-2 – Sample	3	See response to 41-1/2
45-2/1 – Line 501 Summary	1	See response to 41-1/2

45-2/2 – Line 503 Summary	1	See response to 41-1/2
45-2/3 – Line 520 Summary	1	See response to 41-1/2
45-2/4 – Line 523 Summary	1	See response to 41-1/2
45-2/5 – Line 524 Summary	1	See response to 41-1/2
45-2/6 – Line 536 Summary	1	See response to 41-1/2
45-2/7 – Line 692 Summary	2	See response to 41-1/2
45-2-8 – Line 693 Summary	2	See response to 41-1/2
45-2/9 – Line 694 Summary	2	See response to 41-1/2
45-3 – Invoice	9	Substantially all of this invoice provides proprietary route and rate information. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
45-4 – Line items summary detail	18	See response to 41-1/2
45-5 – Line items summary detail	6	See response to 41-1/2
48 – Summary – Amts paid to others – 04	1	The first two lines consist of competitively sensitive, confidential and proprietary Verizon Business financial data. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
48-1 – Amounts paid to others – 2004	1	See response to 41-1/2
48-1/1 – Amounts paid to others – Jan-June 04	7	See response to 41-1/2
48-1/2 – Amounts paid to others – Jul-Dec 04	12	See response to 41-1/2
48-2 – February 04 selection	2	See response to 41-1/2
48-3 – Meeting notes	1	Lines 6-10 of this document provide Verizon Business's proprietary accounting information. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
49 – Florida Telecom Relay	1	See response to 41-1/2
49-1 – FTR filings – 04	11	The lines numbered 1-6 and the previous two unnumbered lines on each page, and the auditors' notes on the document, consist of competitively sensitive, confidential

		and proprietary Verizon Business financial and other data (or information derived from such data). This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
Request 6 #1 – DISK		This disk consists entirely of competitively sensitive, confidential and proprietary Verizon Business financial data. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
Request 6 #2 – DISK		This disk consists entirely of competitively sensitive, confidential and proprietary Verizon Business financial data. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.
Request 17-follow-up – DISK		This disk consists entirely of competitively sensitive, confidential and proprietary Verizon Business financial data, accounting data and an invoice providing proprietary route and rate information. This information has been confidentially maintained by Verizon Business and its disclosure would give its competitors an unfair advantage in developing their own competitive strategies.