

ORIGINAL



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December 22, 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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COMMISSION
CLERK

Re: Docket No. 060650-TL
Joint Petition against BellSouth Telecommunications, Inc., Embarq Florida, Inc.
and Verizon Florida Inc. for billing charges unauthorized by Telecommunications
Consumer Protection Act and request for refunds, by Citizens of the State of
Florida and Attorney General

Dear Ms. Bayo:

Enclosed are an original and 15 copies of Verizon Florida LLC's Request for
Confidential Classification and Motion for Protective Order for filing 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 770-284-5498.

Sincerely,

Dulaney L. O'Roark III

tas

Enclosures

- JMP
- JOM
- JTR
- JCR
- JCL
- JPC
- JCA
- JCR
- JGA
- JEC
- JTH

ICOM records

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition against BellSouth)	Docket No. 060650-TL
Telecommunications, Inc., Embarg Florida,)	Filed: December 22, 2006
Inc. and Verizon Florida Inc. for billing charges)	
unauthorized by Telecommunications)	
Consumer Protection Act and request for)	
refunds, by Citizens of the State of Florida)	
and Attorney General)	
_____)	

VERIZON FLORIDA LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

Under Commission Rule 25-22.006, F.A.C., Verizon Florida LLC ("Verizon") seeks confidential classification and a protective order for information contained in its responses to Commission Staff's First Set of Interrogatories and First Request for Production of Documents in this matter.

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 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"

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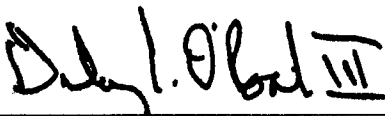
includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

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. 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 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).

In accordance with Rule 25-22.006(4), one copy of the highlighted confidential information is attached as Exhibit A. Two copies with the confidential portions redacted are attached as Exhibit B. Exhibit C lists the specific documents and contains justification of the confidentiality of the information at issue.

Respectfully submitted on December 22, 2006.

By: 
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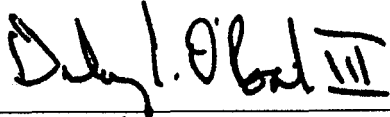
Attorney for Verizon Florida LLC

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Bates Nos. VZ 5 – VZ 16	All pages	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 and marketing their services.
Bates Nos. VZ 17, VZ 18, VZ 19, VZ 22, VZ 23, VZ 24, VZ 25, VZ 28, VZ 29, VZ 30, VZ 32, VZ 33	All highlighted text	This is confidential and proprietary customer information.
Bates Nos. VZ 34 – VZ 247	All pages	This is competitively sensitive, confidential and proprietary third party billing 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 and marketing their services.
Bates Nos. VZ 248 – VZ 260	All pages	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 and marketing their services.
Bates Nos. VZ 261 – VZ 262	All highlighted text	This is competitively sensitive, confidential and proprietary third party billing 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 and marketing their services.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing were sent via U.S. mail on December 22, 2006 to the parties on the attached list.

A handwritten signature in black ink, reading "Dulaney L. O'Roark III". The signature is written in a cursive style with a horizontal line at the end.

Dulaney L. O'Roark III

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