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December 21, 2007

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 070671-TL
Joint petition for approval to eliminate intraLATA toll customer contact protocols,
by Verizon Florida LLC

Dear Ms. Cole:

Enclosed for filing are an original and seven copies of Verizon Florida LLC's Request for Confidential Classification and Motion for Protective Order in connection with its responses to Staff's First Set of Interrogatories and 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 (678) 259-1449.

CMP Sincerely,
COM _____
CTR _____
ECR _____ Dulaney L. O'Roark III
GCL 2 tas
OPC _____
RCA _____ Enclosures
SCR _____
SGA _____
SEC _____
OTH leaf
records

This confidentiality request was filed by or for a "telco" for DN 11151-07. 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.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition for approval to eliminate)
intraLATA toll customer contact protocols, by)
Verizon Florida LLC)
_____)

Docket No. 070671-TL
Filed: December 21, 2007

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 produced in response to Commission Staff's First Set of Interrogatories and 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 ensure success in competing with Verizon. This would afford them an unfair advantage while severely jeopardizing Verizon's competitive position. In a competitive business,

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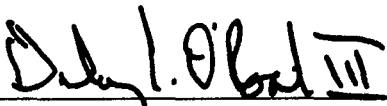
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any knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications 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. Redacted copies of the confidential information are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on December 21, 2007.

By: 
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Attorney for Verizon Florida LLC

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market,” noting that stand-alone long distance service “has largely given way to competition between service bundles that include both local exchange and long distance service or ‘any distance’ minutes that can be used for both local exchange and long distance calling.”¹ The FCC specifically pointed to service bundles being offered by cable operators, VoIP providers and wireless carriers.² Information about competition from such providers in Florida is provided in the 2006 Florida Competition Report and the NERA Report.

Verizon’s own Florida market data supports the conclusion that stand-alone long distance is becoming a fringe market. For example, in September 2005, **% of the new long distance residential customers of Bell Atlantic Communications Inc. d/b/a Verizon Long Distance (“Verizon Long Distance”) in Florida chose packages that included local service, with the balance choosing stand-alone long distance service. By September 2006, **% of Florida Verizon Long Distance’s residential customers were choosing packages that included local service, and by September 2007 that number had increased to **%. Additional market data is provided in response to Interrogatory No. 7.

6. If the scripting requirement is removed for Verizon Florida for intraLATA long distance service, what marketing efforts does Verizon Florida plan to initiate?

RESPONSE: Subject to and without waiving the General Objections, Verizon states that its marketing plans will not change based on whether the intraLATA long distance scripting requirements are removed.

¹ *Id.* ¶ 121.

² *Id.*

PROPRIETARY AND CONFIDENTIAL

EAS/NEUTRAL STATEMENT LPIC/PIC

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ENTIRE DOCUMENT IS
CONFIDENTIAL

PAGES VZ 198 – VZ 213

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LPIC = VZ, MCI, VZLD and PIC is non-VZ
PIC & LPIC = VZ, VZLD or MCI
LPIC = non-VZ and PIC = VZ, VZLD or MCI

ST	LPIC	PIC	Aug-07	Sep-07	Oct-07
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VZ 225

EXHIBIT C

DOCUMENT NOS./ INTERROGATORY RESPONSE	LINE(S)/COLUMN(S)	REASON
Interrogatory Response No. 5	All highlighted text	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.
VZ 225	Entire document	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.
VZ 198 – VZ 213	Entire document	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 internal business practices and strategies.

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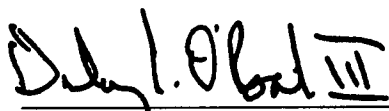
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via overnight delivery
on December 20, 2007 to

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



Dulaney L. O'Roark III

STATE OF FLORIDA

COMMISSIONERS:
LISA POLAK EDGAR, CHAIRMAN
MATTHEW M. CARTER II
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission **CONFIDENTIAL**

ACKNOWLEDGEMENT

DATE: December 21, 2007

TO: Dulaney O'roark/Verizon Florida

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 070671 or, if filed in an undocketed matter, concerning responses to staff's 1st set of Interrogatories and 1st Request for Production of Documents, and filed on behalf of Verizon Florida.

The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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