



Dulaney L. O'Roark III
Vice President-General Counsel, Southeast Region
Legal Department

5055 North Point Parkway
Alpharetta, Georgia 30022
Phone 678-259-1449
Fax 678-259-1589
de.oroark@verizon.com

May 2, 2008 – VIA OVERNIGHT MAIL

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

Re: Docket No. 070691-TP
Complaint and request for emergency relief against Verizon Florida LLC for
anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and
364.10, F.S., and for failure to facilitate transfer of customers' numbers to Bright
House Networks Information Services (Florida), LLC and its affiliate, Bright
House Networks, LLC

Docket No. 080036-TP
Complaint and request for emergency relief against Verizon Florida LLC for
anticompetitive behavior in violation of Sections 364.01(4), 364.3381, and
364.10, F.S., and for failure to facilitate transfer of customers' numbers to
Comcast Phone of Florida, LLC d/b/a Comcast Digital Phone

Dear Ms. Cole:

Enclosed for filing in the above matters are an original and 15 copies of Verizon Florida
LLC's Request for Confidential Classification and Motion for Protective Order in
connection with Verizon's responses to Staff's First Set of Interrogatories (Nos. 1-21).

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.

Sincerely,

Dulaney L. O'Roark III

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Enclosures

This confidentiality request was filed by or for a
"telco" for DNO 03669-08. 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: Complaint and request for emergency relief)
against Verizon Florida LLC for anticompetitive)
behavior in violation of Sections 364.01(4), 364.3381,)
and 364.10, F.S., and for failure to facilitate transfer)
of customers' numbers to Bright House Networks)
Information Services (Florida), LLC and its affiliate,)
Bright House Networks, LLC)

Docket No. 070691-TP
Filed: May 5, 2008

In re: Complaint and request for emergency relief)
against Verizon Florida LLC for anticompetitive)
behavior in violation of Sections 364.01(4), 364.3381,)
and 364.10, F.S., and for failure to facilitate transfer)
of customers' numbers to Comcast Phone)
of Florida, LLC d/b/a Comcast Digital Phone)

Docket No. 080036-TP

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 its responses to Staff's First Set of Interrogatories 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"

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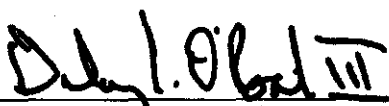
includes "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information."

If competitors were able to acquire 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, 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. Two 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 May 5, 2008.

By: 
Dulaney L. O'Roark III
5055 North Point Parkway
Alpharetta, Georgia 30022
Phone: (678) 259-1449
Fax: (678) 259-1589
Email: de.oroark@verizon.com

Attorney for Verizon Florida LLC

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
VZ 1 – in response to Interrogatory No. 12 Response to Interrogatory No. 18	All highlighted text 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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U. S. mail on May 2, 2008 to:

Beth Salak
Rick Mann
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
bsalak@psc.state.fl.us
rman@psc.state.fl.us

Samuel F. Cullari, Counsel
Comcast Cable
1500 Market Street
Philadelphia, PA 19102
samuel_cullari@comcast.com

Christopher McDonald
Comcast Digital Phone
Director of State Government Affairs
300 West Pensacola Street
Tallahassee, FL 32301
christopher_mcdonald@cable.comcast.com

Charlene Poblete, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
cpoblete@psc.state.fl.us

Christopher W. Savage
Davis Wright Tremaine, LLP
1919 Pennsylvania Avenue, NW, Suite 200
Washington, DC 20006
chrissavage@dwt.com

Beth Keating
Akerman Senterfitt
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
beth.keating@akerman.com

Floyd R. Self
Messer Law Firm
2618 Centennial Place
Tallahassee, FL 32308
fself@lawfla.com

Marva Brown Johnson
Bright House Networks Information Services (Florida), LLC
12985 North Telecom Parkway
Temple Terrace, FL 33637-0907
Marva.johnson@bhnis.com

David A. Konuch
Florida Cable Telecommunications Association
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303
dkonuch@fcta.com

Howard E. Adams
Pennington Law Firm
P. O. Box 10095
Tallahassee, FL 32302-2095
gene@penningtonlaw.com

Carolyn Ridley
Time Warner Telecom
555 Church Street, Suite 2300
Nashville, TN 37219
carolyn.ridley@twtelecom.com


Dulaney L. O'Roark III

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
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NANCY ARGENZIANO
NATHAN A. SKOP



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Public Service Commission

ACKNOWLEDGEMENT

DATE: May 5, 2008

TO: Dulaney L. O'roark Iii, Verizon

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 080000 or, if filed in an undocketed matter, concerning responses to staff's 1st set of Interrogatories Nos. 1-21, and filed on behalf of Verizon. 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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PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us