

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

RECEIVED-FPSC

08 OCT -7 PM 12: 10

COMMISSION
CLERK



5055 North Point Parkway
Alpharetta, Georgia 30022

Phone 678-259-1449
Fax 678-259-1589
de.oroark@verizon.com

October 6, 2008 – VIA OVERNIGHT DELIVERY

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

Re: Docket No. 080159-TP
Joint petition to initiate rulemaking, adopt new rule in Chapter 25-24, F.A.C.,
amend and repeal rules in Chapter 25-4, F.A.C., and amend rules in Chapter
25-9, F.A.C., by Verizon Florida LLC, BellSouth Telecommunications, Inc., d/b/a
AT&T Florida, Embarq Florida, Inc., Quincy Telephone Company d/b/a TDS
Telecom, and Windstream Florida, Inc.

Dear Ms. Cole:

Enclosed for filing in the above-referenced matter are an original and seven copies of
Verizon Florida LLC's Post-Workshop Comments. Also enclosed are an original and
seven copies of a 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 (678) 259-1449.

Sincerely,

Dulaney L. O'Roark III

tas

Enclosures

COM	---
ECR	I
GCL	---
OPC	---
RCP	I
SSC	---
SGA	---
ADM	---
CLK	I

This confidentiality request was filed by or
for a "telco" for DN ~~09467-8~~ 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.

71 OCT 10 12:00 00

RECEIVED

DOCUMENT NUMBER-DATE

09466 OCT-7 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint petition to initiate rulemaking) Docket No. 080159-TP
to adopt new rule in Chapter 25-24, F.A.C.,)
amend and repeal Rules in Chapter 25-4,) Filed: October 7, 2008
F.A.C., and amend rules in Chapter 25-9,)
F.A.C., by Verizon Florida LLC, BellSouth)
Telecommunications, Inc. d/b/a AT&T)
Florida, Embarq Florida, Inc., Quincy)
Telephone Company d/b/a TDS Telecom,)
and Windstream Florida, Inc.)
_____)

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 Post-Workshop Comments 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."

DOCUMENT NUMBER-DATE

09466 OCT-7 8

FPSC-COMMISSION CLERK

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. 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 October 7, 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

CONFIDENTIAL INFORMATION	LINE(S)/COLUMN(S)	REASON
Page 4 of Post-Workshop Comments	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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via U. S. mail on October 7, 2008 to the parties on the attached list.



Dulaney L. O'Roark III

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

E. Edenfield/T. Hatch/M. Gurdian
AT&T Florida
c/o Greg Follensbee
150 S. Monroe Street, Suite 400
Tallahassee, FL 32303-1561

J. Jeffry Wahlen
Ausley Law Firm
P. O. Box 391
Tallahassee, FL 32302

Susan S. Masterton
Embarq Florida, Inc.
1313 Blair Stone Road
Mailstop: FLTLHO0102
Tallahassee, FL 32301

Susan Clark
Radey, Thomas, Yon & Clark
301 S. Bronough Street
Suite 200
Tallahassee, FL 32301

Thomas M. McCabe
TDS Telecom/Quincy Tel.
107 West Franklin Street
Quincy, FL 32351-2310

James White
Windstream Florida, Inc.
4651 Salisbury Road, Suite 151
Jacksonville, FL 32256-6187

Gail Marie Perry
Comm. Workers of America
P. O. Box 1766
Pompano Beach, FL 33601

David A. Konuch
Fla. Cable Telecomm. Assn.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Marsha E. Rule
Rutledge Law Firm
215 S. Monroe St., Suite 420
Tallahassee, FL 32301

AARP
c/o Michael B. Twomey
P. O. Box 5256
Tallahassee, FL 32314-5256

Scott Boyd
Adm. Procedures Committee
Holland Building, Room 120
Tallahassee, FL 32399-1300

Vicki Gordon Kaufman
Anchors Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Wink Infinger
Dept. of Management Services
4030 Esplanade Way, Suite 160C
Tallahassee, FL 32399-0950

Carolyn Mason
Dept. of Management Svcs.
4030 Esplanade Way
Suite 125
Tallahassee, FL 32399-0950

Rebecca Ballesteros
Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, CO 80503

Floyd R. Self
Messer Law Firm
2618 Centennial Place
Tallahassee, FL 32308

Bill McCollum/Cecilia Bradley
Office of Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050

J. R. Kelly
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street
Room 812
Tallahassee, FL 32399-1400

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

Douglas C. Nelson
Sprint Nextel
233 Peachtree Street N.E.
Suite 2200
Atlanta, GA 30303

Carolyn Ridley
Time Warner Telecom
555 Church Street, Suite 2300
Nashville, TN 37219

STATE OF FLORIDA

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



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

CONFIDENTIAL

Public Service Commission

ACKNOWLEDGEMENT

10/7/08 R.V.N.

DATE: October 7, 2008

TO: Dulaney L. O'roark III, Verizon Florida Llc

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 080159 or, if filed in an undocketed matter, concerning information contained in Post Workshop Comments, and filed on behalf of Verizon Florida Llc. 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.

DOCUMENT NUMBER - DATE
09467 OCT -7 80
FPSC - COMMISSION CLERK

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD • TALLAHASSEE, FL 32399-0850
An Affirmative Action/Equal Opportunity Employer

PSC Website: <http://www.floridapsc.com>

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