



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

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COMMISSION
CLERK

April 23, 2009 – VIA OVERNIGHT MAIL

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

Re: Docket No. 080278-TL
Joint Petition for show cause proceedings against Verizon Florida LLC for
apparent violation of Rule 25-4.070, F.A.C., Customer Trouble Reports, and
impose fines, by the Office of the Attorney General, Citizens of the State of
Florida, and AARP

Dear Ms. Cole:

Enclosed for filing in the above matter 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 Request for Production of Documents
(Nos. 1-11) and First Set of Interrogatories (Nos. 1-29).

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 _____
GCL _____
OPC _____
RCP _____
SSC _____
SGA _____
ADM _____
CLK _____

This confidentiality request was filed by or
for a "telco" for DN 03826-09. 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 show cause proceedings) Docket No. 080278-TL
against Verizon Florida LLC for apparent violation of) Filed: April 23, 2009
Rule 25-4.070, F.A.C., Customer Trouble Reports,)
and impose fines, by the Office of the Attorney)
General, Citizens of the State of Florida, and AARP)
_____)

VERIZON FLORIDA INC.'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 Prosecutorial 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 concerning Verizon's internal operations, operating procedures, customer data,

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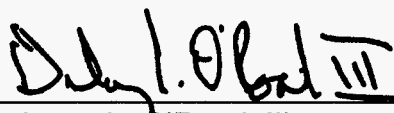
FPSC-COMMISSION CLERK

information and customer survey data, 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 April 23, 2009.

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
<p>Response to Interrogatory 1 a&b (page 4) Response to Interrogatory 25 (page 14)</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential and proprietary business information concerning Verizon's customer lines and internal operations that has been confidentially maintained by Verizon. Disclosure of this information could give competitors an unfair advantage in developing their own competitive strategies.</p>
<p>Documents: VZ 209 VZ 210 VZ 211 – VZ 242 VZ 243 VZ 244 VZ 245 – VZ 248 VZ 249 – VZ 253 VZ 254 – VZ 277</p>	<p>All highlighted text</p>	<p>This is competitively sensitive, confidential and proprietary business information concerning Verizon's internal operations, operating procedures, and customer survey data that has been confidentially maintained by Verizon. Disclosure of this information could give competitors an unfair advantage in developing their own competitive strategies.</p>

CERTIFICATE OF SERVICE

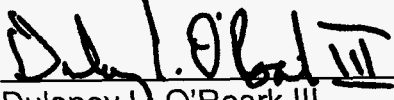
I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on April 23, 2009 to:

Adam Teitzman, Staff Counsel
Lee Eng Tan, Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us
ltan@psc.state.fl.us

Bill McCollum/Cecilia Bradley
Office of Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050
cecilia.bradley@myfloridalegal.com

J. R. Kelly
Patricia Christensen
Charles Beck
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
beck.charles@leg.state.fl.us

Michael B. Twomey
AARP
P. O. Box 5256
Tallahassee, FL 32314-5256
miketwomey@talstar.com


Dulaney L. O'Roark III

STATE OF FLORIDA

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



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

Public Service Commission

ACKNOWLEDGEMENT

DATE: April 24, 2009

TO: Dulaney O'roark, 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 080278 or, if filed in an undocketed matter, concerning responses to staff's 1st Request for PODs, Nos 1-11, and 1st set of Interrogatories, Nos. 1-29, 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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