Kimberly Caswell

Vice President and General Counsel, Southeast Legal Department



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aswell@01

April 20, 2001

Ms. Blanca S. Bayo, Director Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re:

Docket No. 991376-TL

Initiation of Show Cause Proceedings against GTE Florida, Inc., for

Violation of Service Standards

Dear Ms. Bayo:

Please find enclosed for filing the Rebuttal Testimonies of John C. Appel, Russell B. Diamond and John A. Ferrell on behalf of Verizon Florida Inc. in the above matter. The Company considers all the testimonies and exhibits to be confidential and is, therefore, only filing one copy with Records & Reporting. Also enclosed are an original and 15 copies of a Notice of Intent to Seek Confidential Classification of the testimonies and exhibits. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please contact me at 813-483-2617.

Sincerely,

This notice of intent was filed in a docketed matter by or on behalf of a "telco" for Confidential DN 04966-01. The confidential material is in locked storage pending staff advice on handling.

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Kimberly Caswell

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via overnight delivery on April 19, 2001 to:

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

Charles J. Beck, Deputy Public Counsel Office of Public Counsel 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

Kimberly Caswell

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause Proceedings Against GTE Florida Inc. for Violation of Service Standards	)	Docket No. 991376-TL Filed: April 20, 2001
	)	
	)	

## VERIZON FLORIDA INC.'S NOTICE OF INTENT TO SEEK CONFIDENTIAL CLASSIFICATION

Verizon Florida Inc. (Verizon) (formerly, GTE Florida Incorporated) gives notice of its intent to seek confidential classification of the Rebuttal Testimonies and Exhibits (in their entirety) of John C. Appel, Russell B. Diamond and John A. Ferrell filed April 20, 2001 in this proceeding. This Notice exempts this material from section 119.07(1) of the Florida Statutes and section 24(a), Article I of the State Constitution and protects it from public disclosure. All of the information falls within Florida Statutes section 364.183(3)(e), which defines the term "proprietary confidential business information" to include "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of that information." In a competitive business, any such knowledge obtained about a competitor can be used to the detriment of the entity to which it pertains. This unfair advantage skews the operation of the market, to the ultimate detriment of the consumer.

Verizon will file a specific request for permanent protective order later, in accordance with Commission rules.

Respectfully submitted on April 20, 2001.

Bv:

Kimberly Caswell

Post Office Box 110, FLTC0007

Tampa, Florida 33601 Telephone: 813-483-2617

Attorney for Verizon Florida Inc.

DOCUMENT NUMBER-DATE

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