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April 29, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
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Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

1. Responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, 67) (original request filed November 7, 2001); 04645-02
04646-02
2. Confidential Exhibit DBT-3 (Direct Testimony of Dennis B. Trimble) (original request filed November 7, 2001); 04647-02
04648-02
3. Responses to Staff's Second Set of Interrogatories (No. 59) and Second Request for Production of Documents (Nos. 27 and 44) (original request filed January 16, 2002); 04649-02
04650-02
4. Responses to Staff's Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58, 59) (original request filed January 25, 2002); 04651-02
04652-02
5. Responses to AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3,6,13,14) (original request filed February 27, 2002); 04653-02
04654-02
6. Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002); 04655-02
04656-02

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7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002);
04657-02
04658-02
8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and
04659-02
04660-02
9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001).
04661-02
04662-02

Highlighted copies of the confidential information are attached in sealed envelopes together with one redacted copy and a line-by-line justification (Exhibit-C).

If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,


KC
Kimberly Caswell

KC:tas
Enclosures

c: Jason Fudge, Staff Counsel (w/e)

ORIGINAL

990649B-TP

Exhibit C

Staff's Third Request for Production of Documents
Nos. 49, 50, 53, 57, 58 and 59

PageNos.	Line(s)/Column(s)	Reason
POD Nos. 49, 50, 53, 57 and 58	CD-ROM	CD contains Jumper Running and Drive Time studies referenced in witness Richter's direct testimony. The CD contains detailed information about the operation of and labor and cost components underlying Verizon's network functions. This information would be valuable to competitors in designing their own operations and knowing where Verizon might be most vulnerable in terms of its cost structure.
Bates stamped documents 2385-2386 (POD No. 59)	All lines, column B	Source data included in Verizon's Carrier Markets Business Analysis OMT/Local Wholesale Services Business Case Financial Update. This is actual cost data about Verizon's National Market Centers. This information would be valuable to competitors in designing their own operations and knowing where Verizon might be most vulnerable in terms of its cost structure.
Bates Stamped documents 2387-2388 (POD No. 59)	L1-23, col. C, D and E L28-29, dollar amounts All data, columns A-P	Actual cost data from the Florida Wholesale NRC Study. This information would be valuable to competitors in designing their own operations and knowing where Verizon might be most vulnerable in terms of its cost structure.
POD No. 60	Page 76 of Tab A-1 of NRC study	Page was inadvertently omitted from original filing on 11/7/01. Confidentiality already approved per order PSC-02-0427-CFO-TP.

DOCUMENT NUMBER DATE

04651 APR 29 2001

FPSC-COMMISSION CLERK

OMT/Local Wholesale Services
Program Budget - 1997
Ordering Center Nonlabor Expense

04-May-97
ordering wk4

A

B

NOMC Site C

Recurring Nonlabor
Rent Expense
ACD Maintenance Contract
INS Circuit Charges
Facility Preparation
Furniture & Fixtures
Support Assets / LAN / SIGS
ACD / IVRU
Scheduling System
Recruiting
Relocations
Misc Implementation Materials

Total Nonlabor - Site C

Total Nonlabor Expense

REDACTED

2385

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OMT/Local Wholesale Services
Program Budget - 1997
Ordering Center Capital Requirements

03-May-97
ordering wk4

A

B

Durham Site

LAN Upgrade / Fax Server
PCs for Additional Staff
ACD / IVRU
Scheduling System
Facilities Expansion
Furniture & Fixtures

Total Capital - Durham

Fort Wayne Site

PCs for Staff
LAN / SIGS Implementation
ACD / IVRU
Scheduling System
Facilities
Furniture & Fixtures

Total Capital - Ft. Wayne

Site C

PCs for Staff
LAN / SIGS Implementation
ACD / IVRU
Scheduling System
Facilities
Furniture & Fixtures

Total Capital - Site C

Total Capital Requirement

REDACTED

2386

GTE

PBC

Florida Wholesale NRC Study

OMT / Local Wholesale Services Program Budget - 1997

	A	B	C	D	E
		Notes	Business Case Cost (not at capacity) A	Cost to Bring Site C to Capacity B	Site C Cost at Capacity C = A + B
1	NOMC Site C				
2	Ordering Center Nonlabor Expense				
3	Recurring Nonlabor	Note 1			
4	Rent Expense (6 months)	Note 2			
5	ACD Maintenance Contract				
6	INS Circuit Charges				
7	Facility Preparation				
8	Furniture & Fixtures				
9	Support Assets / LAN / SIGS				
10	ACD / IVRU				
11	Scheduling System				
12	Recruiting				
13	Relocations				
14	Misc Implementation Materials				
15	Total Nonlabor - Site C				
16	Ordering Center Capital Requirements				
17	PCs for Staff	Note 3			
18	LAN / SIGS Implementation				
19	ACD / IVRU				
20	Scheduling System				
21	Facilities				
22	Furniture & Fixtures				
23	Total Capital - Site C				

REDACTED

24 Note: These costs are for site C from the OMT business case prepared by the GTE BPSS business analyst. These numbers do not reflect site C at capacity. The additional capital and the additional expense in column B to bring site C to capacity was provided by the GTE BPSS business analyst, except for the recurring nonlabor expense. Recurring nonlabor expense is summarized on workpaper Capacity Cost 3.

2387

27 Note 1: Column A does not reflect Site C at capacity. See Capacity Cost 5 for recurring nonlabor at capacity.
 28 Note 2: Column A does not reflect Site C at capacity as it represents rent for only 6 months. The annual rental cost is \$
 29 Note 3: Column A does not reflect Site C at capacity. Additional PCs are needed at capacity. The additional PC cost

per the GTE BPSS business analyst.
 per the GTE BPSS business analyst

CONFIDENTIAL

Capacity Cost 1

GTE
 Florida Wholesale NRC Study
 Site C Dedicated Support & Administration

PBC

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
BC	Section	Position	M/H	Salary	Level	Location	Annual Salary	MICS/ EIP	Annual IPT	Annual Incurred	Annual Distributed	Months Filled	1997 Incurred Labor	1997 Distributed Labor	1997 Nonlabor Capital

Note: Nonlabor percent is 12.5% of incurred labor costs for management and 7.5% for hourly.

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Capacity Cost 6