

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Emergency Complaint Seeking Order)	Docket No. 040520-TP
Requiring BellSouth Telecommunications, Inc.)	Filed: June 17, 2004
and Verizon Florida Inc. to Continue to Honor)	
Existing Interconnection Obligations, by)	
the Florida Competitive Carriers Association,)	
AT&T Communications of the Southern States,)	
LLC, MCI metro Access Transmission Services,)	
LLC and MCI WorldCom Communications, Inc.)	
<hr/>		

**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 certain information contained in the Company's Response in Opposition to Emergency Petition filed on June 17, 2004 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

06752 JUN 17 04

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 highlighted copy of the confidential information (pages 3 and 8 of the Motion to Dismiss) is attached to the original of this Request as Exhibit A. Two redacted copies are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on June 17, 2004.

By: Richard Chapkis *RW*
Richard Chapkis
201 N. Franklin Street, FLTC0717
Tampa, FL 33602
(813) 483-1256
(813) 204-8870 (fax)

Kimberly Caswell
Associate General Counsel, Verizon Corp.
201 N. Franklin Street, FLTC0007
Tampa, FL 33602
(727) 360-3241
(727) 367-0901 (fax)
Counsel for Verizon Florida Inc.

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Verizon Florida Inc.'s Response in Opposition to Emergency Petition filed June 17, 2004 Docket No. 040520-TP	All highlighted text on page 13	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information could harm the relevant CLECs by giving their competitors an unfair advantage in developing their own competitive strategies. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public.