

ORIGINAL



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December 18, 2000

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

Re: Docket No. 990362-TI
Initiation of Show Cause Proceeding Against GTE Communications
Corporation for Apparent Violation of Rule 25-4.118, F.A.C., Local, Local Toll,
or Toll Provider Selection

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of Verizon Select Services,
Inc.'s Request for Temporary Protective Order in the above matter. 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,

Kimberly Caswell

KC:tas
Enclosures

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- EGR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC _____
- SER _____
- OTH _____

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

This claim of confidentiality was filed by or on behalf of a "telco"
for Confidential DN 15788-00. The document is in
locked storage pending advice on handling. To access the material,
your name must be on the CASR. If undocketed, your division
director must obtain written EXD/Tech permission before you can
access it.

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DOCUMENT NUMBER-DATE

16099 DEC 18 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Initiation of Show Cause Proceeding)	Docket No. 990362-T1
against GTE Communications Corporation)	Filed: December 18, 2000
for Apparent Violation of Rule 25-4.118,)	
F.A.C., Local, Local Toll, or Toll Provider)	
Selection)	
_____)	

**VERIZON SELECT SERVICES, INC.'S
REQUEST FOR TEMPORARY PROTECTIVE ORDER**

Pursuant to Commission Rule 25-22.006(6)(c), Verizon Select Services, Inc. (VSSI), formerly GTE Communications Corporation, requests a temporary protective order covering VSSI's confidential information filed with the Commission by the Office of Public Counsel (OPC). This information is: (1) the deposition of Larry Commons and an accompanying confidential exhibit, filed by OPC on December 8, 2000; and (2) the testimony and exhibit of R. Earl Poucher, filed by OPC on December 15, 2000. OPC filed all of these documents under confidential cover.

The documents covered by this Request fall 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 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.

VSSI is filing this Request to ensure that its confidential information remains protected from public disclosure and exempted from section 119.07(1) of the Florida Statutes. If any of the confidential information or documents is admitted into the record at

DOCUMENT NUMBER-DATE

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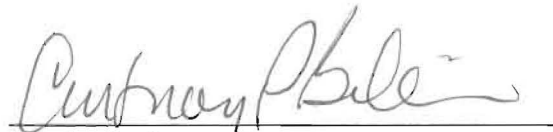
FPSC-RECORDS/REPORTING

the hearing, Commission Rule 25-22.006(8)(b) requires VSSI to file a specific request for permanent protective order within 21 days after the hearing. To the extent that OPC believes VSSI is required to file such a specific request at this point, it is mistaken. See *Initiation of Show Cause Proceedings Against GTE Florida Incorporated*, Docket 991376-TL, Order No. PSC-00-1140-PCO-TL (June 23, 2000).

Respectfully submitted on December 18, 2000.

By:

Kim



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Telephone: 813-483-2617

Attorney for Verizon Select Services, Inc.

CERTIFICATE OF SERVICE

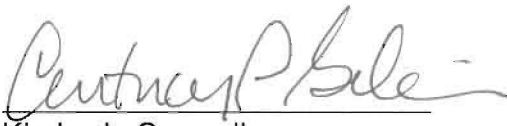
I HEREBY CERTIFY that copies of Verizon Select Services, Inc.'s Request for Temporary Protective Order in Docket No. 990362-TI were sent via U.S. mail on December 18, 2000 to:

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