Kimberly Caswell Vice President and General Counsel, Southeast Legal Department DISTRIBUTION CENTER 02 APR 29 AN 9:33



FLTC0007 201 North Franklin Street (33602) Post Office Box 110 Tampa, Florida 33601-0110

Phone 813 483-2606 Fax 813 204-8870



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

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); の 4 6 4 7 - の 2 の 4 6 4 % - の 2
- 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);
- 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
- 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); 04651-02
- Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002);

04656-02

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Ms. Blanca S. Bayo April 29, 2002 Page 2

- 7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002); 04657-02 04657-02
- 8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and D4659-02
- 9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001). のそんなーでス のそんなーでス

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, Kimberly Caswell

KC:tas Enclosures

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

## 9906498-TP ORIGINAL

Exhibit C David G. Tucek's Surrebuttal Exhibit No. DGT-5

PageNos.	Line(s)/Column(s)	Reason
Surrebuttal Exhibit No. DGT-5	L4, 6 and 7 – highlighted information L13-17, col. A-C	The exhibit responds to the question: On a per-line basis, does ICM-FL model higher switch costs for the GTD-5 than it does for the 5ESS and Nortel switches? The information contains third-party vendor confidential data which is to be treated as confidential under Verizon's agreements with its vendors. If competitors are able to acquire this sensitive costing information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon.

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Verizon - Florida			Docket No. 990649B-T
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