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December 23, 2008 - **VIA HAND DELIVERY**

Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

Re: Docket No. 080234-TP

In re: Implementation of Florida lifeline program involving bundled service packages and placement of additional enrollment requirements on customers

Dear Ms. Cole:

Enclosed for filing in the above matter are an original and 15 copies of Verizon Florida LLC's Request for Confidential Classification and Motion for Protective Order in connection with Verizon's Objections and Responses to Commission Staff's First Set of Interrogatories. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please call me at 678-259-1449.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

This confidentiality request was filed by or for a "telco" for DN 11814-08. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail and U.S. Mail on December 23, 2008 to:

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s/ Dulaney L. O'Roark III
Dulaney L. O'Roark III

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Florida lifeline program) Docket No. 080234-TP
involving bundled service packages and) Filed: December 23, 2008
placement of additional enrollment requirements)
on customers)
_____)

VERIZON FLORIDA LLC'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

Under Commission Rule 25-22.006, F.A.C., Verizon Florida LLC (Verizon) seeks confidential classification and a protective order for information produced in response to Commission Staff's First Set of Interrogatories 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."

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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 copy of the confidential information is attached to the original of this Request as Exhibit A. Redacted copies of the confidential information are attached as Exhibit B. A detailed justification of the confidentiality of the information at issue is attached as Exhibit C.

Respectfully submitted on December 23, 2008.

By: s/ Dulaney L. O'Roark III
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Attorney for Verizon Florida LLC

RESPONSE: Subject to and without waiving the General Objections, Verizon states that as of November 2008 **CONFIDENTIAL** _____% **END CONFIDENTIAL** of Verizon's residential access lines were used for bundled services.

11. Is it in the public interest to not allow a Lifeline discount on bundled service packages?

RESPONSE: Subject to and without waiving the General Objections, Verizon states that it is not in the public interest to require telecommunications companies to provide the Lifeline discount on residential access lines used for bundled services, for the reasons explained in the Direct Testimony of Paul Vasington.

12. If a person calls Verizon to request telephone service, does a Verizon sales representative sometimes attempt to sell that person a bundled service package?

RESPONSE: Subject to and without waiving the General Objections, Verizon states that when appropriate its service representatives seek to sell bundled services to prospective customers who call Verizon.

12a. If, the answer to 12 is "yes," what percentage of callers requesting telephone service does Verizon attempt to sell a bundled service package?

RESPONSE: Subject to and without waiving the General Objections, Verizon states that it does not track the percentage of times its representatives attempt to sell bundled service packages to prospective customers.

12b. If the answer to 12 is "yes," does Verizon's practice of attempting to sell callers requesting telephone service a bundled service package also apply to callers who request the Lifeline discount?

EXHIBIT C

INTERROGATORY RESPONSE	LINE(S)/COLUMN(S)	REASON
Interrogatory Response No. 10	Highlighted text	This is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon. Disclosure of this information could give competitors an unfair advantage in developing their own competitive strategies by revealing Verizon's pricing and negotiating strategies.