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November 3, 2009 – VIA OVERNIGHT MAIL

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

Re: Docket No. 080278-TL
Joint Petition for show cause proceedings against Verizon Florida LLC for
apparent violation of Rule 25-4.070, F.A.C., service availability, and impose fines,
by the Office of the Attorney General, Citizens of the State of Florida, and AARP

Dear Ms. Cole:

Enclosed for filing are an original and 15 copies of Verizon Florida LLC's Request for Confidential Classification and Motion for Protective Order in connection with the Rebuttal Testimony of Earl Poucher filed on behalf of the Citizens of the State of Florida in this proceeding. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (678) 259-1449.

Sincerely,

Dulaney L. O'Roark III

tas

Enclosures

COM _____
ECR _____
GCL 1
OPC _____
RAD 13
SSC _____
APA _____
ADM _____
CLK 1

DOCUMENT NUMBER - DATE

11127 NOV-4 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for show cause proceedings) Docket No. 080278-TL
against Verizon Florida LLC for apparent violation of) Filed: November 4, 2009
Rule 25-4.070, F.A.C., service availability, and)
impose fines, by the Office of the Attorney General,)
Citizens of the State of Florida, and AARP)
_____)

**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 contained in the Rebuttal Testimony of Earl Poucher filed on behalf of the Citizens of the State of Florida 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 provides 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

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FPSC-COMMISSION CLERK

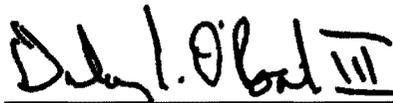
If competitors were able to acquire this detailed and sensitive information regarding Verizon, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon. This would afford them an unfair advantage while severely jeopardizing Verizon's competitive position. 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).

A highlighted copy of the confidential information is attached as Exhibit A. Two 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 November 4, 2009.

By:



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Attorney for Verizon Florida LLC

EXHIBIT C

CONFIDENTIAL INFORMATION	LINE(S)/COLUMN(S)	REASON
Rebuttal Testimony of Earl Poucher: Page 3 Page 8 Page 9 Page 10 Page 11 Page 12 Page 13 Page 15 Page 16	Line 10 Lines 10-12 Line 3 Line 9 Lines 21-24 Lines 1, 8-11, 17-18 Lines 2, 4-8, 16-17, 20 Lines 22, 25 Lines 5, 7, 9-11	This information includes internal management communications, budget information, analysis and information relating to Verizon's internal operations and operating procedures. This information is competitively sensitive, confidential and proprietary business information that has been confidentially maintained by Verizon.
VZ 517 – VZ 518	All highlighted text	
Exhibit REP-7, p. 3 of 3	All highlighted text	
VZ 539 – VZ 540	All highlighted text	
VZ 607 – VZ 608	All highlighted text	
VZ 1985	All highlighted text	
VZ 1595 – VZ 1596	All highlighted text	
VZ 1598	All highlighted text	
VZ 1919 – VZ 1920	All highlighted text	
VZ 578 – VZ 585	All highlighted text	
Exhibit REP-15, p. 3 of 3	All highlighted text	

CERTIFICATE OF SERVICE

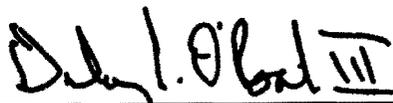
I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on November 4, 2009 to:

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STATE OF FLORIDA



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: November 4, 2009

TO: Dulaney O'roark III, Verizon

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 080278 or, if filed in an undocketed matter, concerning information contained in rebuttal testimony of Earl Poucher filed on behalf of Citizens of the State of Florida, and filed on behalf of Verizon. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.

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