Dulaney L. O'Roark III General Counsel-Southern Region Legal Department

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Phone 678-259-1657 Fax 678-259-5326 de.oroark@verizon.com

October 25, 2011 - VIA OVERNIGHT MAIL

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

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Re: Docket No. 110056-TP

Complaint against Verizon Florida LLC and MCI Communications Services, Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC

Dear Ms. Cole:

Enclosed for filing in the above matter are an original and seven copies of Verizon's Claim of Confidentiality in connection with its responses to Bright House Networks Information Services (Florida), LLC's First Set of Interrogatories (Nos. 1-38). Also enclosed are one highlighted and two redacted copies of the information for which confidential treatment is requested.

Service has been made as indicated on the Certificate of Service. If there are any questions regarding this matter, please call me at 678-259-1657.

Sincerely,

Dulaney L. O'Roark III

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## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint against Verizon Florida LLC and MCI Communications Services Inc. d/b/a Verizon Business Services for failure to pay intrastate access charges for the origination and termination of intrastate interexchange telecommunications service, by Bright House Networks Information Services (Florida), LLC Docket No. 110056-TP Filed: October 25, 2011

## VERIZON'S CLAIM OF CONFIDENTIALITY

In accordance with Florida Administrative Code Rule 25-22.006(5), Verizon Business Services ("Verizon") asks the Commission to give confidential treatment to and protect from public disclosure certain information Verizon is providing in its responses to the First Set of Interrogatories from Bright House Networks Information Services (Florida), LLC ("Bright House").

Verizon and Bright House have entered into a Protective Agreement under which Verizon has agreed to provide, in discovery, information and documents which are "proprietary confidential business information" as defined in section 364.183(3) of the Florida Statutes. Consistent with the Order Establishing Procedure in this docket (Order No. PSC-11-0417-PCO-EI), Verizon has served Commission Staff with copies of its responses to Bright House's discovery. Those responses include information about intercarrier compensation disputes between Verizon and third parties that both Verizon and the third parties treat as confidential, sensitive information that they have protected from public disclosure.

If it appears likely that the confidential information at issue will be used in the proceeding here (or if it becomes subject to a public records request), Verizon

## DOCUMENT NO. DATE

01901-11 10124111 FPSC - COMMISSION CLERK understands that it will be required to file a detailed Request for Confidential Classification before the hearing, in accordance with Rule 25-22.006(5)(c).

One highlighted and two redacted copies of the information that is subject to this claim of confidentiality are included with this filing.

Respectfully submitted on October 25, 2011.

By:

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Attorney for Verizon

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via electronic mail on October 25, 2011 to:

Adam Teitzman Lawrence Harris Martha Brown Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>ateitzma@psc.state.fl.us</u> <u>lharris@psc.state.fl.us</u> <u>mbrown@psc.state.fl.us</u>

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