

Dulaney L. O'Roark III
General Counsel-South



One Verizon Place
Alpharetta, Georgia 30004
Phone: 678-339-5081
Fax: 678-339-8492
de.oroark@verizon.com

May 13, 2014 – VIA OVERNIGHT MAIL

Carlotta S. Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
14 MAY 14 PM 2:58
COMMISSION
CLERK

Re: Undocketed – ACN 13-274-1-2
Regulatory Assessment Fee Reviews

Dear Ms. Stauffer:

14 sas 5/14/14

Enclosed for filing in the above matter are an original and ~~2~~ copies of MCI/metro Access Transmission Service LLC d/b/a Verizon Access Transmission Services' Request for Confidential Classification and Motion for Protective Order in connection with information provided by Verizon to Commission auditors regarding the Commission's audit of Verizon's regulatory assessment fee payments.

Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at 678-339-5081.

Sincerely,

Dulaney L. O'Roark III

Enclosures

COM _____
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ECO _____
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IDM _____
TEL 6 _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Regulatory Assessment Fee Reviews) Undocketed
) ACN 13-274-1-1
) Filed: May 14, 2014
_____)

VERIZON ACCESS' REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER

Under Commission Rule 25-22.006, F.A.C., MCImetro Access Transmission Service LLC d/b/a Verizon Access Transmission Services (Verizon Access) seeks confidential classification and a protective order for information contained in audit work papers that include information Verizon Access provided to Commission auditors in connection with its audit of Verizon Access' regulatory assessment fee (RAF) payments.

All of the information for which Verizon Access 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."

If competitors were able to acquire this detailed and sensitive information regarding Verizon Access, they could more easily develop entry and marketing strategies to ensure success in competing with Verizon Access. This would afford them an unfair advantage while severely jeopardizing Verizon Access' 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 Access respectfully requests that the Commission classify the identified information as confidential and enter an appropriate protective order.

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 May 14, 2014.

By: 
Dulaney J. O'Roark III
One Verizon Place
Alpharetta, GA 30004
Phone: 678-339-5081
Email: de.oroark@verizon.com

Attorney for Verizon Access

EXHIBIT C

CONFIDENTIAL INFORMATION	LINE(S)/COLUMN(S)	REASON
Confidential workpapers, pp. 1-3, 5-6, 8-9	All highlighted text	This information competitively sensitive, confidential and proprietary business information relating to Verizon Access' financial reporting systems. This information has been confidentially maintained by Verizon Access.
Confidential workpapers, pp. 4-5, 7, 9-11	All highlighted text	This information is competitively sensitive, confidential and proprietary business information relating to Verizon Access' revenues and payments to other telecommunications companies that has been confidentially maintained by Verizon Access.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was sent via overnight mail on

May 13, 2014 to:

Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

D. J. O'Neal III