

ORIGINAL

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November 19, 2003

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

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Re: Docket No. 030867-TL
Petition of Verizon Florida Inc. to Reform Its Intrastate Network Access and Basic
Local Telecommunications Rates in Accordance with Florida Statutes, Section
364.164

Docket No. 030961-TI
Flow-through of LEC switched access reductions by IXCs, pursuant to Section
364.163(2), Florida Statutes

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of a Request for Confidential
Classification and Motion for Protective Order on behalf of Bell Atlantic Communications,
Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon
Enterprise Solutions and Verizon Select Services Inc. in connection with the Direct
Testimony of John Broten in the above matter. Service has been made as indicated on
the Certificate of Service. If there are any questions regarding this filing, please contact
me at 813-483-2615.

Sincerely,

Anthony P. Gillman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Verizon Florida Inc. to Reform)
Its Intrastate Network Access and Basic Local)
Telecommunications Rates in Accordance with)
Florida Statutes, Section 364.164)

Docket No. 030867-TL
Filed: November 19, 2003

In re: Flow-through of LEC switched access)
reductions by IXCs, pursuant to Section)
364.163(2), Florida Statutes)

Docket No. 030961-TI

**BELL ATLANTIC COMMUNICATIONS, INC. D/B/A VERIZON LONG
DISTANCE, NYNEX LONG DISTANCE COMPANY D/B/A VERIZON
ENTERPRISE SOLUTIONS AND VERIZON SELECT SERVICES INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

Under Commission Rule 25-22.006, Bell Atlantic Communications, Inc. d/b/a Verizon Long Distance, NYNEX Long Distance Company d/b/a Verizon Enterprise Solutions and Verizon Select Services Inc. (Verizon) seeks confidential classification and a protective order for certain information contained in the Direct Testimony of John Broten filed in the above matters.

All of the information for which Verizon seeks confidential treatment falls within Florida Statutes section 364.183(3)(e), which defines the term, "proprietary confidential business information," to include "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, 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

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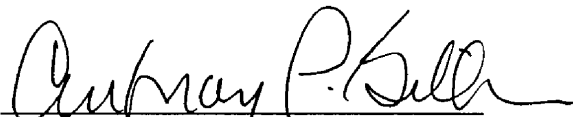
competitor can be used to the detriment of the entity to which it pertains, often in ways that cannot be fully anticipated. This unfair advantage skews the operation of the market, to the ultimate detriment of the telecommunications consumer.

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 highlighted copy of the confidential information is attached to the original of this Request as Exhibit A. Two redacted copies 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 19, 2003.

By:



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Counsel for Verizon

EXHIBIT C

DOCUMENT	LINE(S)/COLUMN(S)	REASON
Direct Testimony of John Broten Page 5 Page 6	All highlighted text Lines 16 and 17 Line 11	The highlighted confidential information depicts market information that is competitively sensitive, confidential and proprietary. This information provides insight into the Company's marketing focus as it provides a breakdown of its residential and business customer segments and provides information regarding the percentage penetration into the Florida market by particular long distance plans. Disclosure of this information would cause harm to the Company by giving its competitors an unfair advantage in developing their marketing plans in Florida for their own services. It would be particularly unfair to disclose this information because similar information about competitive carriers is not made available to the public. Moreover, this information has been maintained as confidential by the Company internally and would not be available to the public other than through this proceeding.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Request for Confidential Classification and Motion for Protective Order in connection with the Direct Testimony of John Broten in Docket Nos. 030867-TL and 030961-TI were sent via electronic mail and overnight delivery on November 19, 2003 to:

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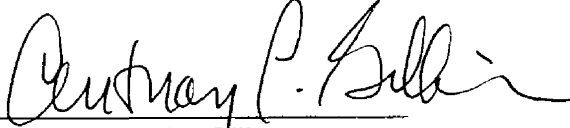
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