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June 18, 2003

**THE ATTACHED COST
INFORMATION IS BEING
SUBMITTED UNDER SEAL**

in support of Transmittal No. 327 - Amended

Transmittal No. 327 - Amended

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

**Re: Verizon Request for Confidential Treatment of Cost Information Filed under
Seal in Support of Transmittal No. 327**

Attention: Wireline Competition Bureau

Today, Verizon¹ is amending its support documentation filed with Transmittal No. 327, its 2003 Annual Access Tariff filing, filed on June 16, 2003. Because of its competitively sensitive nature, Verizon has redacted certain demand data associated with Amended Transmittal No. 327. Accordingly, pursuant to Sections 0.457 and 0.459 of the FCC's rules, 47 C.F.R., Section 0.457 and 0.459; pursuant to Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4); and pursuant to the Tariff Streamlining Order and rules adopted thereunder, Verizon is hereby requesting that such demand data be treated as confidential and be made subject to the standard Protective Order and Declaration adopted by the Commission in the Tariff Streamlining Order and published in Appendix B thereof.

¹ The Verizon Telephone Companies include Verizon Delaware Inc.; Verizon Maryland Inc.; Verizon New England Inc.; Verizon New Jersey Inc.; Verizon New York Inc.; Verizon Pennsylvania Inc.; Verizon Virginia Inc.; Verizon Washington, D.C. Inc.; and Verizon West Virginia Inc. These companies will now be referred to as Verizon-East. Verizon East is comprised of the former Bell Atlantic-North (NYNEX) and Bell Atlantic-South. The Verizon Telephone Companies also include the states of AZ, CA, FL, HI, ID, IL, IN, MI, NC, NV, OH, OR, PA, SC, TX, VA, WA, WI, and Micronesia. These jurisdictions will be referred to as Verizon-West (formerly GTOC and GSTC).

Under Exemption 4 of the FOIA, commercial or financial information is held to be confidential, and thus entitled to protection, if disclosure of such information would, inter alia, be likely to cause substantial harm to the competitive position of the person from whom the information was obtained. See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 830 f.2d 278 (D.C. Cir. 1987).

The information for which Verizon seeks confidential treatment is competitively sensitive demand data which, if made available to competitors and alternate providers, would provide such entities with valuable information regarding Verizon's customer base in particular zones within a state. This information would assist competitors in targeting their marketing efforts to the areas with the largest concentrations of customers.

For the reason cited above, Verizon respectfully requests that the Commission grant confidential treatment to certain Zone detail end user demand information submitted in support of Amended Transmittal No. 327, and that such information be subject to the standard protective order provided for in the Tariff Streamlining Order. Pursuant to the non-disclosure agreement that provides for review of information granted confidential treatment by interested parties, for the specific purpose of review and comment on the instant transmittal only, Verizon will provide access and review of such information to signatories of such an agreement at the following location:

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Should you have any questions, please do not hesitate to call me.

A handwritten signature in cursive script, reading "Richard T. Ellis".