



Suzanne Carmel
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December 17, 2004

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

in support of Transmittal No. 525, which is being filed on a streamlined basis
on 15 days notice under Section 204(a)(3)
of the Telecommunications Act.

Verizon Transmittal No. 525
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. 525**

Attention: Wireline Competition Bureau

Dear Ms. Dortch:

Today, Verizon¹ is filing a correction to its 2004 Annual Access Tariff filing for Tariff FCC Nos. 1 and 11, Access Services, under Transmittal No. 525, which is being filed on 15 days' notice pursuant to the Commission's Tariff Streamlining Order.² Because of its competitively sensitive nature, Verizon has redacted certain demand data associated with Transmittal No. 525. Accordingly, Verizon is hereby requesting, pursuant to Sections 0.457 and 0.459 of the Commission'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

¹ The Verizon Telephone Companies affected by this filing are 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.

² Tariff Streamlining Order, CC Docket No. 96-187, Released January 31, 1997.

Order and rules adopted thereunder, 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.

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 Transmittal No. 525, 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:

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

Sincerely,

A handwritten signature in black ink, appearing to read "Suzanne Carmel", written in a cursive style.