



**Amy Kavelman**  
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June 15, 2007

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

In support of Transmittal No. 821 which is being filed on a streamlined basis  
on 15 days notice under Section 204(a)(3)  
of the Telecommunications Act.

Verizon Transmittal No. 821  
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 821.**

Attention: Wireline Competition Bureau

**Dear Ms. Dortch:**

Today, Verizon<sup>1</sup> is filing its 2007 Annual Access Tariff filing for Tariff F.C.C. Nos. 1, 11 and 16, Access Services and Tariff F.C.C. No. 14, Facilities for Interstate Access, under Transmittal No. 821, which is being filed on 15 days notice pursuant to the Commission's Tariff Streamlining Order.<sup>2</sup> Because of its competitively sensitive nature, Verizon has redacted certain demand data associated with Transmittal No. 821. 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

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<sup>1</sup> The Verizon Telephone Companies include (a) Verizon Delaware LLC; 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.; Verizon West Virginia Inc; and (b) Verizon California Inc., Verizon Florida LLC, Verizon North Inc., Verizon Northwest Inc., Verizon South Inc., Verizon West Coast Inc., Contel of the South, Inc. d/b/a Verizon North Systems; and GTE Southwest Incorporated d/b/a Verizon Southwest. The companies in (a) will be referred to as Verizon East. Verizon East is comprised of the former Bell Atlantic-North (NYNEX) and Bell Atlantic-South. The companies in (b) will be referred to as Verizon-West (formerly GTE Telephone Operating Telephone Companies (GTOC) and GTE System Telephone Companies (GSTC)).

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

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, 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 alternative 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 these reasons, Verizon respectfully requests that the Commission grant confidential treatment to certain Zone detail end user demand information submitted in support of Transmittal No. 821, 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 location listed below.

All correspondence and inquiries in connection with this application should be forwarded to Amy Kavelman, Director, Federal Regulatory Advocacy via facsimile on (202) 515-2587 or by hand-delivery to 1300 I Street, NW, Suite 400 West, Washington, DC 20005.

A handwritten signature in black ink, appearing to read "Amy Kavelman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.