

ALLTEL COMMUNICATIONS
One Allied Drive
Little Rock, AR 72202
P.O. Box 2177, 72203-2177

ORIGINAL
ALLTEL

February 17, 2004

VIA OVERNIGHT MAIL

Ms. Blanca Bayo, Director
Division of Commission Clerk and
Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RECEIVED-PPSC
FEB 18 PM 2:34
COMMISSION
CLERK

Re: Docket No. 030851-TP-ALLTEL's Confidential Discovery Responses

Dear Ms. Bayo:

Please find enclosed for filing an original and 15 copies of ALLTEL Communications, Inc.'s Request for Confidential Classification and Motion for Protective Order in connection with ALLTEL's Responses to BellSouth's Discovery Requests filed with the Commission February 4, 2004 by BellSouth. Pursuant to Section 364.183(1), Florida Statutes, ALLTEL claims that the information contains confidential and proprietary business information that should be held exempt from public disclosure.

Please acknowledge receipt of this letter by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,



Stephen B. Rowell, Senior Vice President
State Government Affairs

SBR/bjw
Enclosures
cc: Parties of Record

AUS
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FPSC-BUREAU OF RECORDS

This confidentiality request was filed by or for a "telco" for DNO 02342-04. No ruling is required unless the material is subject to a request per 119.07, FS, or is admitted in the record per Rule 25-22.006(8)(b), FAC.

DOCUMENT NUMBER-DATE
02341 FEB 18 04
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Implementation of Requirements Arising)
From Federal Communications Commission's Triennial)
UNE Review: Local Circuit Switching for Mass Market)
Customers)
_____)

Docket No. 030851-TP
Filed: February 17, 2004

**ALLTEL COMMUNICATIONS, INC.'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER**

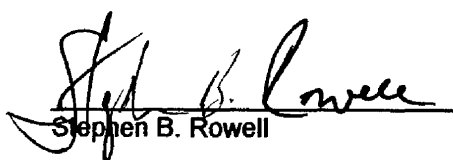
Under Commission Rule 25-22.006, F.A.C., ALLTEL Communications, Inc. ("ALLTEL") seeks confidential classification and a protective order for certain information contained in the Company's responses to BellSouth's Subpoena Request (specifically Nos. 2, 3, 6(a) and (b)) in this proceeding.

All of the information for which ALLTEL 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.

This is detailed and sensitive customer information, that if made public would afford competitors an unfair advantage regarding ALLTEL's 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. Accordingly, ALLTEL respectfully requests that the Commission classify the identified documents as confidential and enter the appropriate protective order.

Respectfully submitted on February 17, 2004.

By: 
Stephen B. Rowell

ALLTEL Communications, Inc.
Responses to Deposition Questions of BellSouth
Docket NO. 030851-TP

j. 10 or fewer lines? “

6. For each grouping of customer locations identified in Question 5 (locations with 1 line, locations with 2 or fewer lines, etc.), provide:

a. The individual customer locations. Initially, it will be sufficient to provide these locations by wire center service area. If that information is not readily available, then the information should be provided by actual customer address. To explain further, this question asks you to provide, initially by wire center service area, the number of customer locations you serve that have one line, two lines or fewer, three lines or fewer, etc. If you cannot provide the information by wire center service area, then provide this information by actual customer location, i.e. Customer A is located at 1234 Broadway, Miami, Florida, and has one line, and so forth.

[REDACTED]

b. The number of lines at each location that are used to provide voice service, and the number of lines that are used to provide data service, identified separately. If each line is used to provide both voice and data, so indicate.

[REDACTED]

c. If you know that the specific customer location is served by lines provided by another CLEC, or by an ILEC, provide the number of DS0/voice grade equivalent lines provided at each customer location by other CLECs or ILECs.

Response: Not applicable

7. Provide the street address (e.g., 123 Main Street), the city (e.g., Miami), and the state (e.g., FL) where every switch identified in response to Question 1 is located.

*Response: 601 Riverside Avenue 3 West Building, Jacksonville,
Florida 32204*

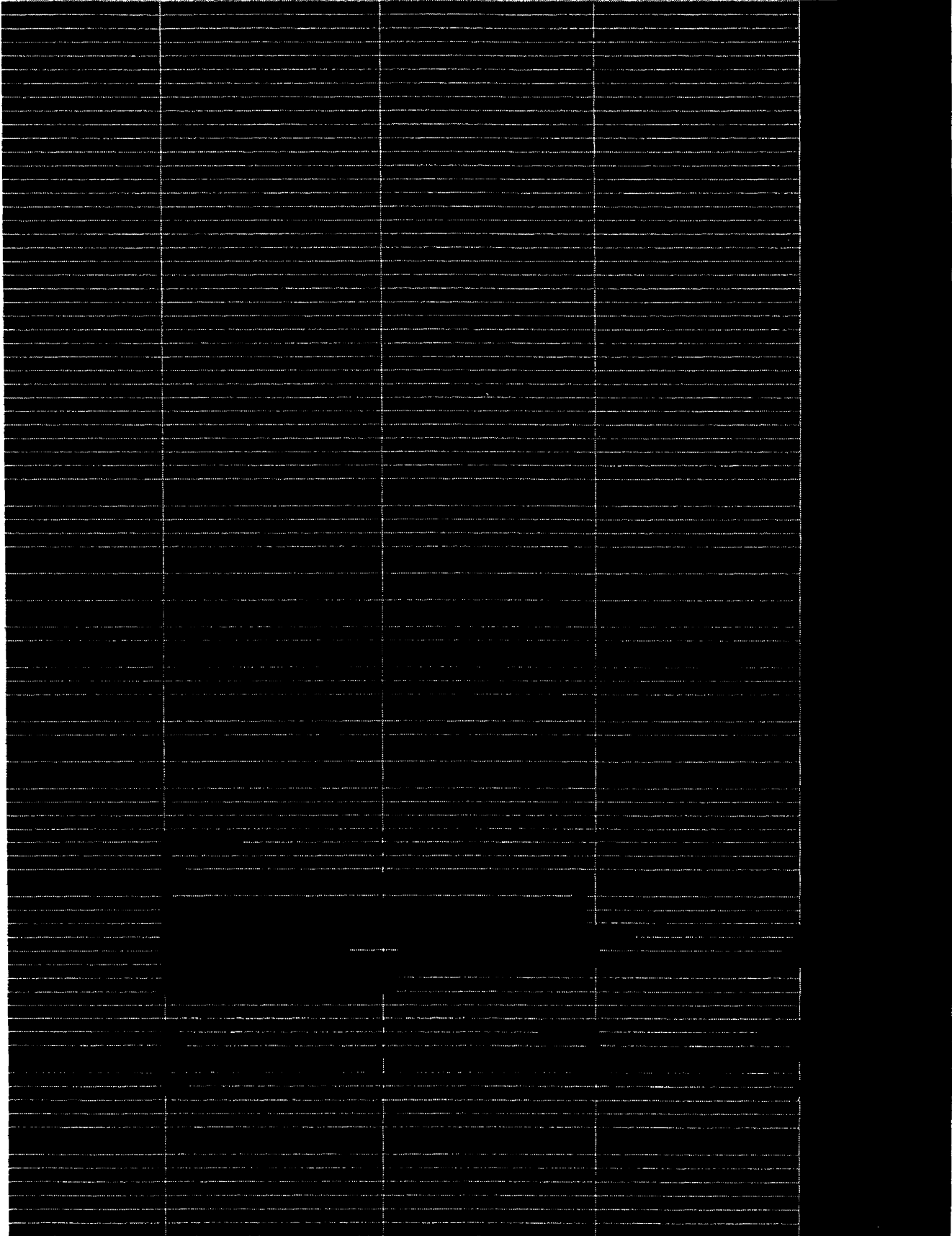
8. Do you offer to provide or do you provide switching to other carriers for their use in serving customers? If yes, state: (a) the carriers to whom you provide switching; (b) the types of service, if known, that are provided by the carriers to whom you provide switching; (c) whether you will provide switching to any requesting carrier; (d) identify each wire center district (by eight digit CLLI code) in which wholesale switching is available.

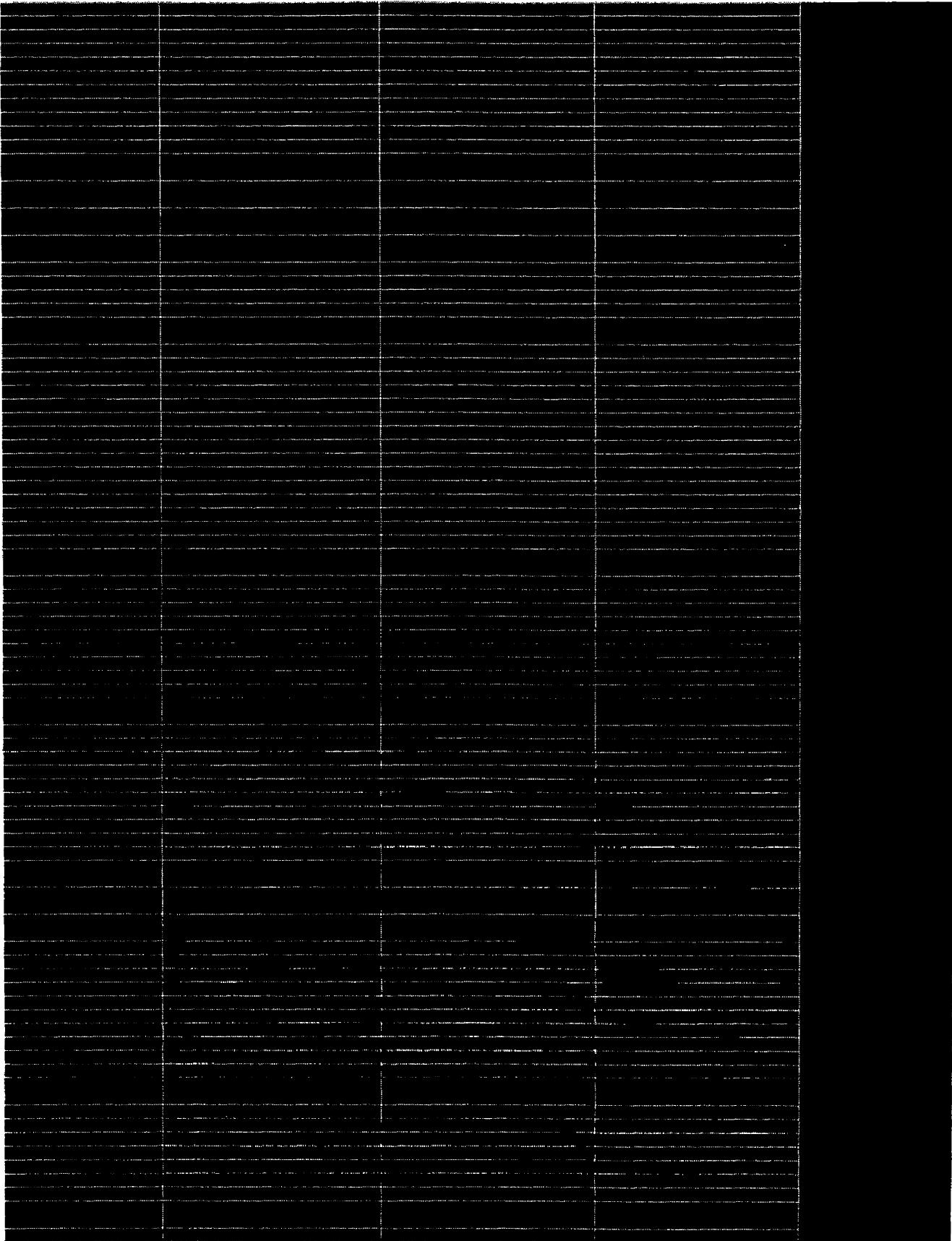
Response: No

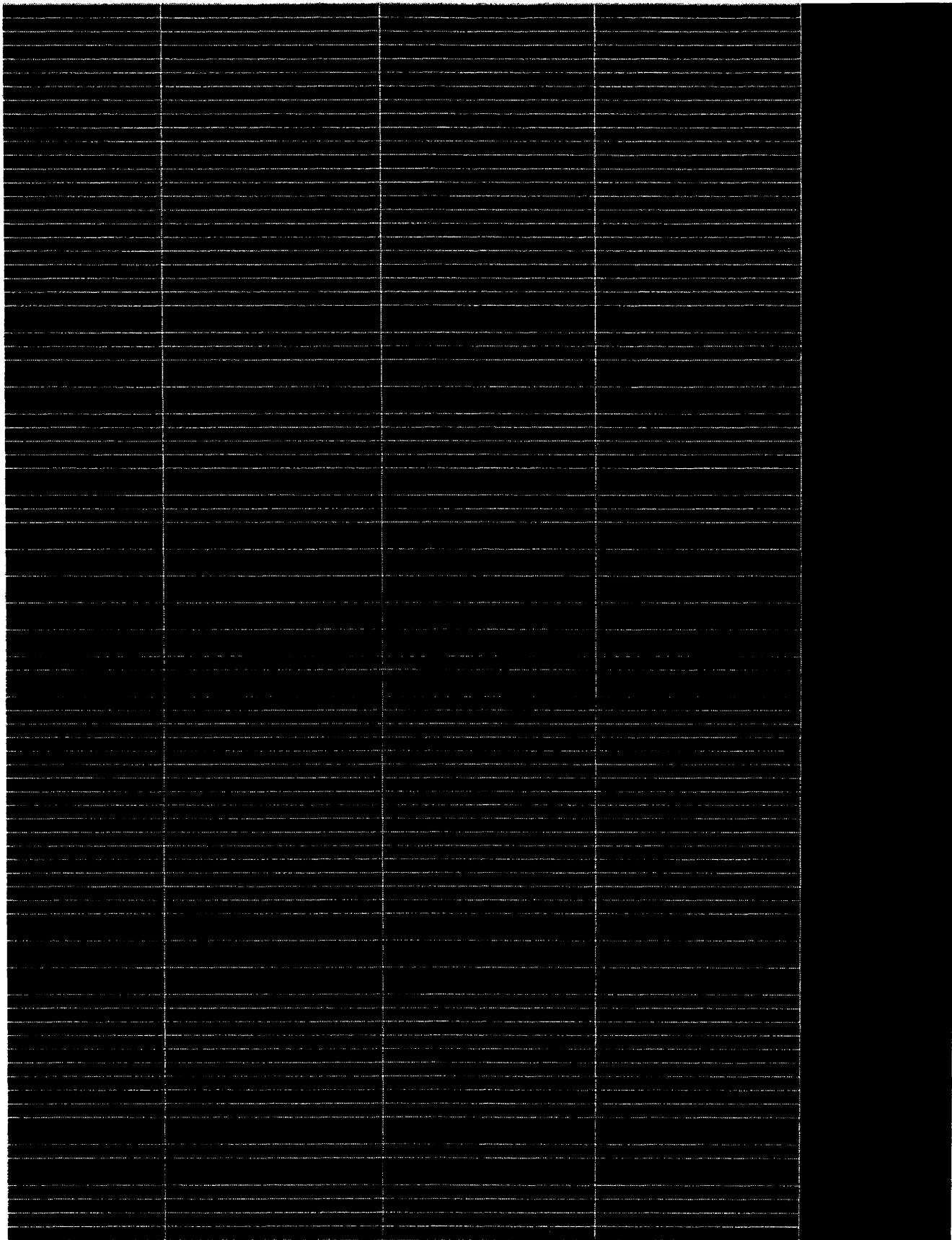
ALLTEL Communications, Inc.
Responses to Deposition Questions of BellSouth
Docket NO. 030851-TP

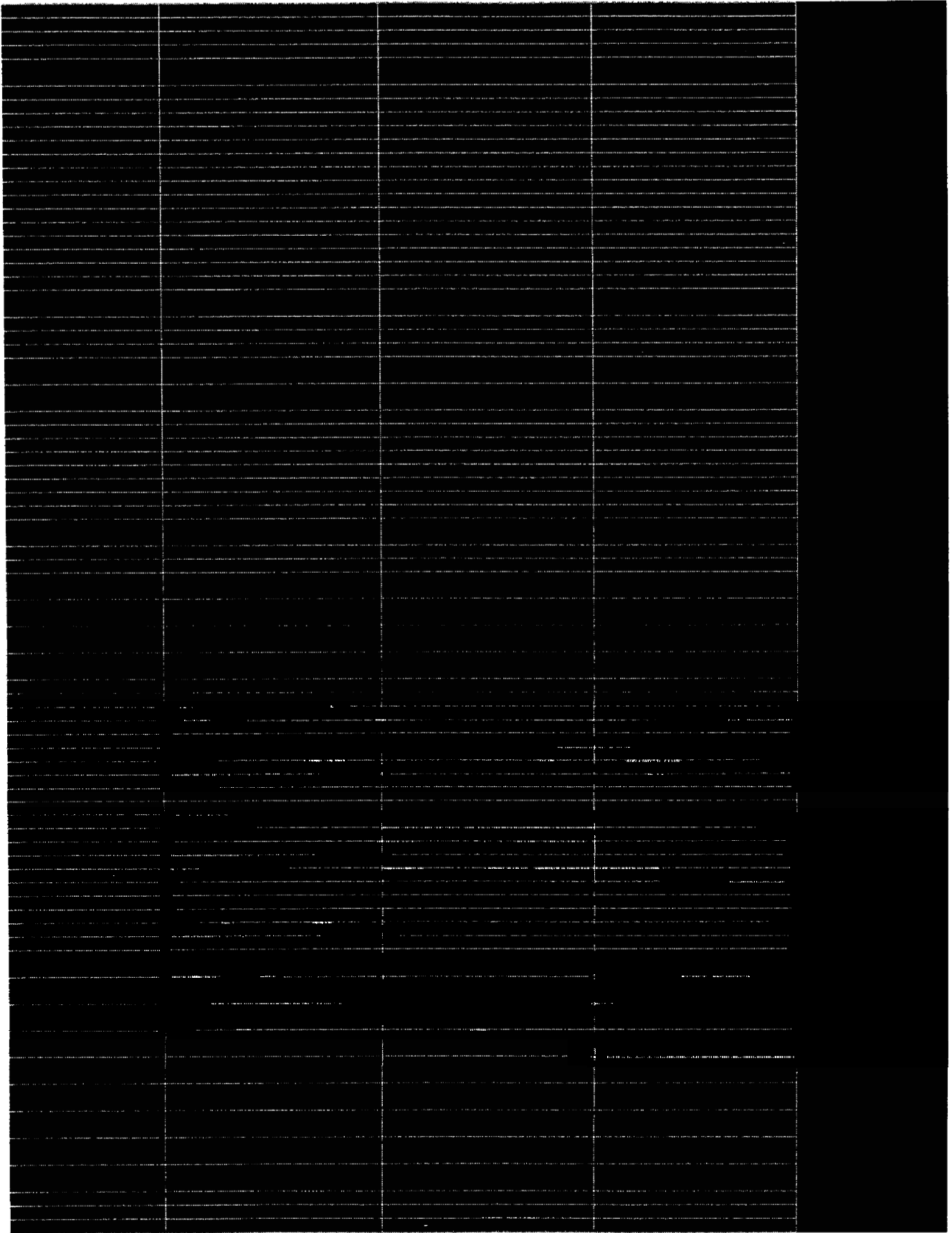
9. State whether you have any plans to terminate your service in any area in Florida that is currently served by the switches identified in response to Question 1. If you do, identify the areas where you intend to terminate service (and by areas we mean geographic areas, not individual customers).

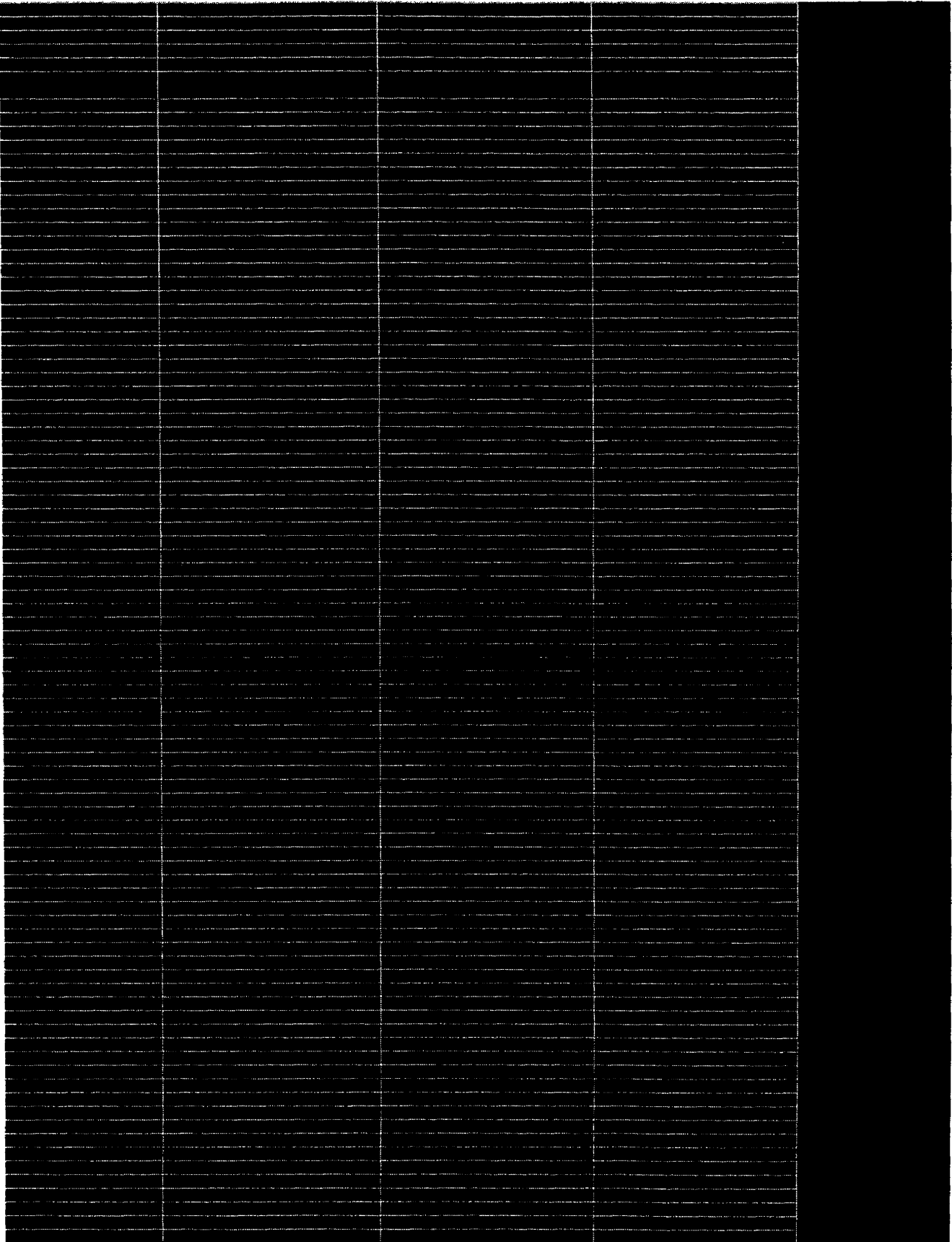
Response: Unknown at this time.

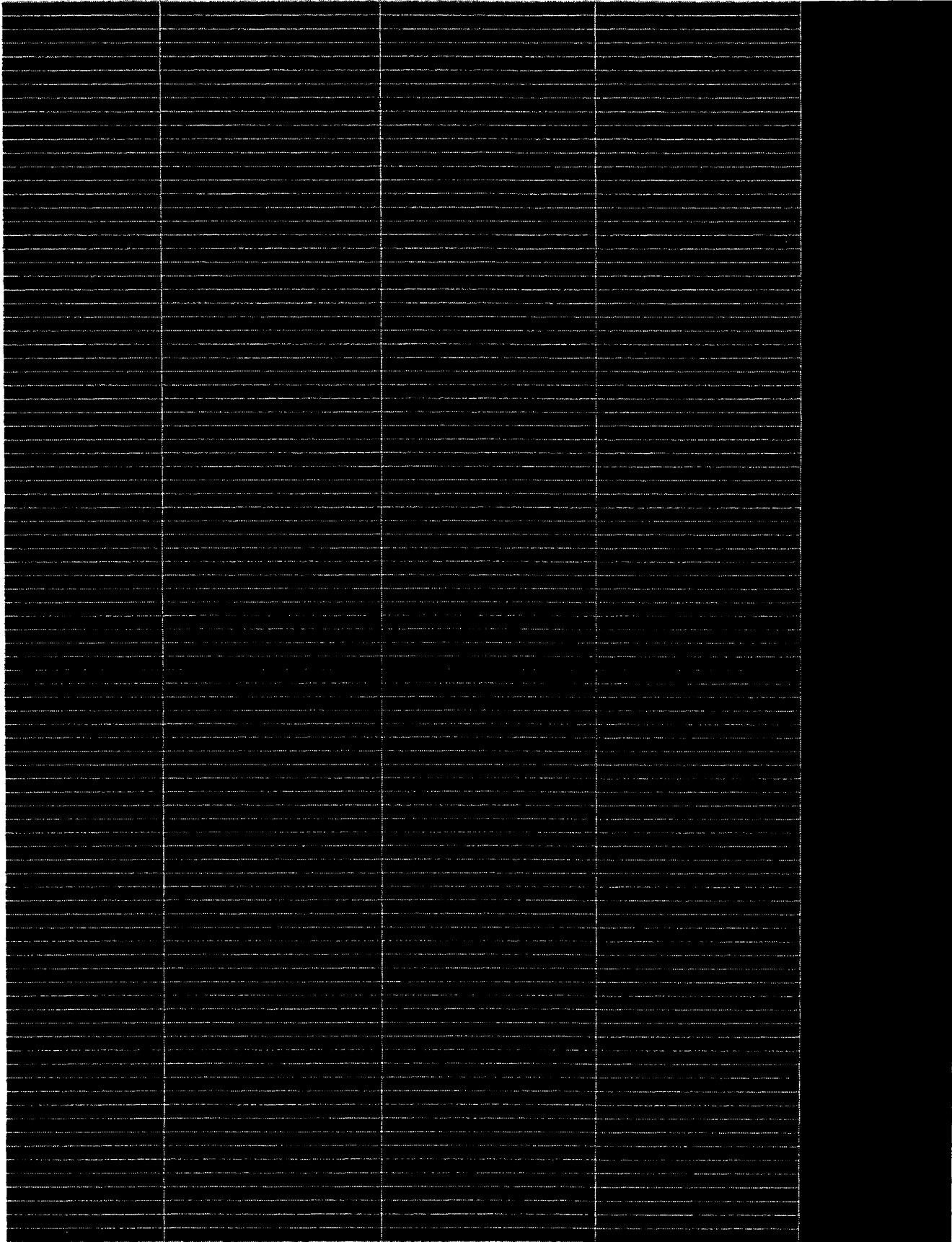












[REDACTED]

