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December 16, 2005

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Re: Dkt. No. 050693-TL; Alltel Florida, Inc.'s Petition to Reduce Intrastate Switched Access Rates in a Revenue Neutral Manner Pursuant to Section 364.164, Florida

Statutes.

Dear Ms. Bayo:

Enclosed for filing on behalf of Alltel Florida, Inc. ("Alltel") are the original and fifteen (15) copies of Alltel's Sixth Request for Confidential Classification.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

Teffry Wahler

Enclosures

cc: Charles J. Beck, Office of Public Counsel (w/encls.)

Jeremy Susac, Staff Counsel (w/encls.)

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In re: Alltel Florida, Inc.'s Petition)		
To Reduce Intrastate Switched Network)		
Access Rates In A Revenue Neutral)	Docket No	o.: 050693-TL
Manner Pursuant to Section 364.164,)	Filed:	12.16.05
Florida Statutes)		
)		

ALLTEL FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

Alltel Florida, Inc. ("Alltel" or the "Company") hereby files this request that the Florida Public Service Commission ("FPSC" or the "Commission") classify certain documents and/or records identified herein as confidential, exempt from public disclosure under Chapter 119, Florida Statutes, and issue a protective order reflecting such decision and protecting the information in the possession of the Commission and the Office of the Public Counsel ("OPC" or "Public Counsel").

- 1. The information that is the subject of this request is contained in certain documents filed with the Clerk's Office on November 28, 2005, in response to Staff's Fourth and Fifth Sets of Interrogatories [DNs 11265-05 and 11264-05]. These documents are the subject of Alltel's Fifth Notice of Intent to Request Confidential Classification (DN 11262-05) and Fifth Motion for Temporary Protective Order (DN 11263-05).
- 2. Specifically, the following documents or excerpts from documents are the subject of this request:

Answers to Staff's Fourth IRR, Nos. 98, 100, 101, 103 and 105 Answers to Staff's Fifth IRR, Nos. 108 and 111

- 3. One unredacted copy of these documents with the confidential information highlighted in yellow has been labeled Attachment C and has been submitted under separate cover to the Division of Records and Reporting contemporaneously with the filing of this request. A copy on which the information asserted to be confidential has been redacted has been labeled Attachment B and are included with the original of this request.
- 4. The information for which this request is submitted is trade secret or other highly proprietary competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment A.
 - 5. Section 364.183(3), Florida Statutes, states:
 - (3) The term "proprietary confidential business information" means 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. The term includes, but is not limited to:
 - (a) Trade secrets.
 - (b) Internal auditing controls and reports of internal auditors.
 - (c) Security measures, systems, or procedures.
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

Furthermore, Section 688.002(4), Florida Statutes is instructive on what 6. constitutes a trade secret and provides that:

(4) "Trade secret" means information, including a formula, pattern, compilation,

program, device, method, technique, or process that:

(a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other

persons who can obtain economic value from its disclosure or use; and

(b) Is the subject of efforts that are reasonable under the circumstances to maintain

its secrecy.

The subject information to this request has not been publicly released. 7.

Furthermore, release of the information could impair the company's ability to compete for, or

negotiate with, certain business customers.

WHEREFORE, based on the foregoing, Alltel respectfully requests that the Commission

grant this request, exempt the Confidential Material specified herein from disclosure under

Chapter 119, Florida Statutes, and issue a protective order, protecting the information from

disclosure while it is maintained at the Commission and in the possession of the Office of the

Public Counsel.

RESPECTFULLY SUBMITTED this 16th of December, 2005.

Ausley McMullen

Post Office Box 391

Tallahassee, Florida 32302

850.425.5471 (direct)

850.558.1315 (fax)

jwahlen@ausley.com

Fla. Bar No. 884316

ATTORNEYS FOR

ALLTEL FLORIDA, INC.

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Certificate of Service

I hereby certify that a true and correct of the foregoing (without Attachment C and with only one copy of attachment B) was served by hand delivery and electronic mail this 16^{th} day of December, 2005, to the following:

Jeremy Susac Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Charles J. Beck, Deputy Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399-1400

ATTACHMENT A

Document and Page and Line Numbers	Justification for Confidential Treatment
Staff Fourth IRR, No. 98, page 1, lines 1, 3, 5, 7: percentage data	Reflects Alltel's penetration percentage for certain bundles of service. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Staff Fourth IRR, No. 100: page 1, lines 1, 2, 3 and 4; percentage data	Reflects Alltel's penetration percentage for DSL. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Staff Fourth IRR, No. 101: page 1, Col. B, Lines 1-5	Reflects Alltel's originating and terminating access revenues for 2000-2004. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Staff Fourth IRR, No. 103: page 1, Col. B, Lines 1-6	Reflects Alltel's number of DSL customers for 2000-2005. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Staff Fourth IRR, No. 105: page 2, Col. B, Lines 1-10	Reflects Alltel's number of resold lines by CLEC. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Staff Fifth IRR, No. 108, attachment: Col. B, Lines 1-20	Reflects Alltel's number of disconnects by month for 2004-05. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)

Staff Fifth IRR, No. 111, page1, line 1, data point	Reflects Alltel's number of customers who do not subscribe to long distance service. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)

In re: Alltel Florida, Inc.'s Petition)	
To Reduce Intrastate Switched Network)	
Access Rates In A Revenue Neutral)	Docket No.: 050693-TL
Manner Pursuant to Section 364.164,)	
Florida Statutes)	
)	

ALLTEL FLORIDA, INC.'S SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION

One Redacted Copy

Attachment B

In re: Alltel Florida, Inc.'s Petition)		
To Reduce Intrastate Switched Network)		
Access Rates In A Revenue Neutral)	Docket No.:	050693 - TL
Manner Pursuant to Section 364.164,)	Dated:	11.28.05
Florida Statutes)		
)		

ALLTEL'S ANSWERS TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 93-105)

CONFIDENTIAL ANSWERS

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 98
Page 1 of 1

CONFIDENTIAL VERSION

- 98. For the following questions, please refer to ALLTEL's response to Staff's First Set of Interrogatories, No. 23.
 - a. What percentage of residential access lines are subscribed to the Connect Unlimited bundle?
 - b. What percentage of business access lines are subscribed to the Connect Unlimited bundle?
 - c. What percentage of residential access lines are subscribed to the "Dime All of the Time" calling plan?
 - d. What percentage of business access lines are subscribed to the "Dime All of the Time" calling plan?

ANSWER:

- 1 a. As of November 3, 2005, of residential access lines subscribed to the Connect Unlimited bundle
- b. of business access lines are subscribed to the Connect Unlimited bundle. Connect Unlimited is not available to business customers.
- of residential access lines are subscribed to the Dime All of the Time calling plan.
- 7 d. of business access lines are subscribed to the Dime All of the Time calling plan. Dime All The Time is not available to business customers.

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 100
Page 1 of 1

Confidential Version

- 100. For the following questions, please refer to ALLTEL's response to Staff's Second Set of Interrogatories, No. 55.
 - a. What percentage of residential access lines subscribe to ALLTEL Florida's DSL?
 - b. What percentage of business access lines subscribe to ALLTEL Florida's DSL?
 - c. To what percentage of residential access lines is ALLTEL Florida's DSL available?
 - d. To what percentage of business access lines is ALLTEL Florida's DSL available?
 - e. If DSL is not available in all of ALLTEL Florida's wire centers, please list the wire centers where DSL is not available.

ANSWER:

- 1 a. of residential access lines subscribe to Alltel Florida's DSL.
- 2 b. of business access lines subscribe to Alltel Florida's DSL.
- 3 c. DSL is available to of Alltel Florida residential access lines.
- 4 d. DSL is available to of Alltel Florida business access lines.
- 5 e. DSL is not available in Alltel Florida exchange/wire center Hastings.

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 101
Page 1 of 1

Confidential Version

101. Please provide total intrastate switched access originating and terminating revenue for the years 2000, 2001, 2002, 2003, and 2004.

Alltel Florida, Inc. Docket No. 050693-TL Staff's Fourth Set of Interrogatories Interrogatory No. 103 Page 1 of 1

Confidential Version

103. Please identify the number of DSL lines in service as of year-end 2000 through 2004, and as of August 2005.

ANSWER:

2000 - B

2 2001 -

3 2002 -

4 2003 -

6 2004 -

(August 2005 -

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 105
Page 1 of 2

CONFIDENTIAL VERSION

- 105. For purposes of the following request, please refer to Alltel's response to staff's Interrogatories No. 11 and 85.
 - a. Is the number of resold lines identified in response to Interrogatory No. 11 only business lines?
 - b. If the response to (a) is negative, please provide a breakdown of this amount between residential and business.
 - c. Please identify the entities to whom these lines are being provided.
 - d. Please identify how many resold lines are being provided to each of the entities identified in response to (c).
 - e. Does the company know whether any of the entities identified in response to (c) are providing prepaid local service?
 - f. If the response to (e) is affirmative, please identify which entities are providing prepaid local service.

<u>ANSWER:</u>

- a. The resold lines identified in response to Interrogatory No. 11 are only residential lines.
- b. See response to a.
- c. ACTEL Wireless-FL, Bellerud Communications, CAT Communications, Coastal Connections-FL, Flatel, Inc., Global Connection, Met Communications, Ring Connection, Source One, Universal.

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 105
Page 2 of 2

CONFIDENTIAL VERSION

A

B

d. ACTEL Wireless-FL

Bellerud Communications

CAT Communications

Coastal Connections-FL

Flatel, Inc.

Global Connection

Met Communications

Ring Connection

a Source One

Universal

- e. Alltel is not aware of the arrangement the resellers have with their endusers and therefore can not say with certainty which resellers are providing prepaid service. The interconnection agreements between Alltel Florida and the resellers do not specify whether the reseller will provide prepaid service.
- f. See response to e. above.

AFFIDAVIT

STATE OF ARKANSAS COUNTY OF PULASKI

BEFORE ME, the undersigned authority, personally appeared BETTYE WILLIS, who deposed and said that she is employed by Alltel as Staff Manager – External Affairs and that ALLTEL Florida, Inc.'s answers to Staff's Fifth Set of Interrogatories attributed to her are true and correct to the best of her information and belief.

DATED this day of November, 2005.

BETTYE WILLIS

The foregoing instrument was acknowledged before me this 2000 day of November, 2005, by BETTYE WILLIS, who is personally known to me.

7.

Sandra Jean Wove

Title, Rank, Serial No. etc.

My Commission Expires:

My Comm Expires
SEPT. 1, 2011

COUNT

Title, Rank, Serial No., etc.

My Commission Expires:



In re. Alltel Florida, Inc.'s Petition To Reduce Intrastate Switched Network Access Rates In A Revenue Neutral Manner Pursuant to Section 364.164, Florida Statutes)	Docket No.: Dated:	050693-TL 11.28.05	
)			

ALLTEL'S ANSWERS TO STAFF'S FIFTH SET OF INTERROGATORIES (NOS. 106-112)

CONFIDENTIAL ANSWERS

Alltel Florida, Inc. Docket No. 050693-TL Staff's Fifth Set of Interrogatories Interrogatory No. 108 Page 1 of 1

CONFIDENTIAL VERSION

108. If customers disconnecting due to moving from Alltel's service territory are not reflected in response to Staff's First RPD, please provide the number of these disconnects for each month from January 2004 through August 2005.

ANSWER:

See attached schedule.

ALLTEL Florida, INC. Disconnects (Res & Bus)

	k	Ь
	MONTH	LC_
!	1/2004	r Aga
	2/2004	# \
•	3/2004	<u>.</u>
•	4/2004	
ŝ	5/2004	
	6/2004	
•	7/2004	W. 1
•	8/2004	<u> </u>
	9/2004	i i i i i i i i i i i i i i i i i i i
10	10/2004	(A)
•	11/2004	S.
•	12/2004	
٠	-1/2005	3)
;	2/2005	
1	3/2005	
•	4/2005	
•	5/2005	
•	6/2005	
	7/2005	¥.
V	0 8/2005	

Customer is moving outside an Allte! service area

.

Alltel Florida, Inc.
Docket No. 050693-TL
Staff's Fourth Set of Interrogatories
Interrogatory No. 111
Page 1 of 1

CONFIDENTIAL VERSION

For the following questions please refer to response to Staff's Second Set of Interrogatories, #71.

111. Please provide the number of Alltel residential customers currently who do not subscribe to Alltel long distance service or the long distance service of its affiliate.

ANSWER:

- Alltel Florida, Inc. has residential customers currently who do not subscribe to
- Alltel long distance service or the long distance service of its affiliate.

AFFIDAVIT

STATE OF ARKANSAS COUNTY OF PULASKI

BEFORE ME, the undersigned authority, personally appeared BETTYE WILLIS, who deposed and said that she is employed by Alltel as Staff Manager — External Affairs and that ALLTEL Florida, Inc.'s answers to Staff's Fifth Set of Interrogatories attributed to her are true and correct to the best of her information and belief.

DATED this day of November, 2005.

BETTYE WILLIS

The foregoing instrument was acknowledged before me this Alk day of November, 2005, by BETTYE WILLIS, who is personally known to me.

Sanger Jean Wood

printed name

Title, Rank, Serial No., etc.

My Commission Expires:

My Comm. Expires
SEPT. 1. 2011

OUBLICATION

Title, Rark, Serial No., etc.

My Commission Expires:

