



# Public Service Commission

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## -M-E-M-O-R-A-N-D-U-M-

**DATE:** January 25, 2006

**TO:** Adam J. Teitzman, Senior Attorney, Office of the General Counsel  
Della E. Fordham, Administrative Assistant II - SES, Division of Competitive Markets & Enforcement  
Andrea N. Cowart, Executive Secretary to General Counsel

**FROM:** Brenda J. Merritt, Statistician II, Division of Competitive Markets & Enforcement  
David L. Dowds, Public Utilities Supervisor, Division of Competitive Markets & Enforcement

**RE:** Recommendations for Certain Requests for Confidential Classification in Docket No. 050693-TL

ALLTEL Florida, Inc. has a pending Request for Confidential Classification, as summarized below:

Requesting Party	Document Description	Compliance with Rule <sup>1</sup>	Specific Information and Justification
ALLTEL	Document No. 10806-05 OPC's 1 <sup>st</sup> POD No. 2, page 1, cols A-I, lines 1-7	Yes.  Rule 25.22.006(4)	<b>Justification for Confidential Treatment</b> Reflects toll conversation minutes and messages for Alltel and other carriers by month, which is competitive market share data not generally available to competitors. Alltel maintains this information as confidential. Alltel is not privy to this data from its competitors at no cost, so making this data available to competitors at no cost would put Alltel at a competitive disadvantage relative to its competitors, thereby harming the company.
ALLTEL	OPC's 1 <sup>st</sup> POD, No. 3, page 1, lines 1-2, col A	Yes.  Rule 25.22.006(4)	This data shows Alltel's average revenue per business and residential customer, and reflects competitive market data for Alltel. Alltel is not privy to this data for its competitors at no cost, so making this data available to

<sup>1</sup> Rule 25-22.006(4), Florida Administrative Code addresses requests for confidential classification. Rule 26-22.006(5) addresses claims of confidential treatment pursuant to Section 364.183(1), Florida Statutes.

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			competitors at no cost would put Alltel at a competitive disadvantage relative to its competitors, thereby harming the company.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 9, page 2, cols A-R, lines FL, FL, and FL; pages 3 and 9, cols A-T, lines 1-27.	Yes. Rule 25.22.006(4)	This data reflects Alltel's monthly access line forecast from 7/05 to 12/06, in total (page 2) and by exchange (page 3 and 9) and shows the extent to which Alltel expects to gain or lose access lines. Pages 3 and 9 also reflect Alltel's estimation of the magnitude of access line loss. This data is market share data that reflects Alltel's estimation of the extent to which it will be able to maintain market share due to competitive factors. Alltel is not privy to this type of market share data for its competitors, so making this data available to competitors at no cost would put Alltel at a competitive disadvantage relative to its competitors, thereby harming the company.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 10, page 1, lines 1-2, cols A-M	Yes. Rule 25.22.006(4)	Reflects Alltel's forecast of access minutes of use for 2006. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 1, lines 1-2, cols D-H; page 2, lines 1-2, cols A-B.	Yes. Rule 25.22.006(4)	Reflects Alltel's forecast of access minutes of use for 2006. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD,	Yes.	Reflects Alltel's access lines/units by

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	No. 13, page 5, cols A-B, D-F, G-I, J-L, lines 1-31; page 6, cols A-B, D-F, H-J, L-N, lines 1-31.	Rule 25.22.006(4)	exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 and B1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 7, cols C, D, F, H, J, K, lines 1-12.	Yes. Rule 25.22.006(4)	Reflects Alltel's NRC units by service (service orders, premise visits and central office work), as well as revenues generated for such services. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 9, lines 1-34, cols A-C, F, & G.	Yes. Rule 25.22.006(4)	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 11, lines 1-9, col A.	Yes. Rule 25.22.006(4)	This graph reflects the size of Alltel's exchanges, which is competitive market data about Alltel's customer base. This data reflects market information for services subject to competition. Disclosure of this information will harm Alltel's competitive business

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			interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. Redacting vertical axis precludes the reader from determining size of exchanges.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 12, lines 1-34, cols A-C, F & G.	Yes.  Rule 25.22.006(4)	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 13, col B, lines 1-28 and 1-27, col C, E-G, I-K, M-O, lines 1-28.	Yes.  Rule 25.22.006(4)	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 14, lines 1-28, cols B, C, E-G, I-K, & M-O.	Yes.  Rule 25.22.006(4)	Reflects Alltel's access line/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for B1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is

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			disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, page 15, cols A, B, D, F, & H, lines 1-10.	Yes. Rule 25.22.006(4)	Reflects Alltel's NRC units by service (service orders, premise visits and central office work), as well as revenues generated for such services. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 13, pages 16-17, cols A-F, lines 1-15 and 1-13.	Yes. Rule 25.22.006(4)	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 and B1 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 information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 14, lines 1-27, cols C, D, F, & G.	Yes. Rule 25.22.006(4)	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and percentage penetration, which if disclosed would allow a calculation back to access lines. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	OPC 1 <sup>st</sup> POD, No. 15, lines 1-23, cols A, B, D-H.	Yes. Rule 25.22.006(4)	The data on these pages reflect Alltel's analysis of the reasons customers disconnected from Alltel's network for the period from January 2004 to

<b>Requesting Party</b>	<b>Document Description</b>	<b>Compliance with Rule<sup>1</sup></b>	<b>Specific Information and Justification</b>
			<p>September 2005, and in particular, the number of disconnects attributable to competition from CLECs. This data reflects a measure of the extent to which competitors are entering Alltel's market and is considered sensitive market share data that is maintained as confidential by Alltel. Alltel is not privy to the disconnect data of its competitors, so making this data available to competitors at no cost would put Alltel at a competitive disadvantage relative to its competitors. thereby harming the company.</p>