



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

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

DATE: November 18, 2005

TO: Jeremy L. Susac, 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 ¹	Specific Information and Justification
ALLTEL	Document #09998-05 Staff's 1 st RPD No. 8 (BRF) page 1, lines 1a, 2a, 3, a-c, 5a and b; page 2, line 5a-c, 6a-e, 7a-e, 8a and b, 10, a-c; page 3, lines 1, 4, 7, 9, 13-15; page 4, lines 1-3, 6, 15-16; page 5, lines 1-3, 6-7, 10, 14, 15-20; page 6, lines 1-5, 13, 15, 19; page 7, lines 1-15, 19-20, 25, 27-36; page 8, lines 1-5, 8-25,	Yes. Rule 25.22.006(4)	Reflects the names, addresses, telephone numbers, fax numbers, email addresses and other personal or company identifying information for companies that have submitted bona fide requests for interconnection/resale or other agreements with Alltel. Alltel maintains this information as confidential at the request of the company making the BFR, on grounds that competitors do not want their business plans released to the public or other competitors. Disclosure of this information will harm Alltel's business interests, by chilling the ability/willingness of potential competitors to make a BFR and/or engage in negotiations.

¹ 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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	<p>27-28, 30, 33, page 9, lines 1-2, 6, 7; page 10, 1-3, 11, 15, 20-21; page 11, lines 1, 22, 23, 25; page 12 lines 1-7, 10, 12-18, 22, 24-25; page 13, lines 26, 28, 31-33; page 14, lines 1a, 2a and b, 3a-c; page 15, lines 5a-e, 6a-e, 7a-e, 8a and b, 10a-e; page 16, lines 1a, 2a and b, 3a-d, 4a and b; page 17, lines 5a-e, 6a-e, 7a-e, 8a, 10a-d; page 18, lines 1 and 3; page 19, lines 1a, 2a-b,3a-c, 4a; page 20, lines 5a-e, 6a-e, 7a-e, 8a-b, 10a-c.</p>		
ALLTEL	<p>Staff's 1st RPD No. 12: page 1, lines 1-22, columns A-L; page 2, lines 1-21, Col A-I.</p>	<p>Yes. Rule 25.22.006(4)</p>	<p>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 September 2005, and in particular, the number of disconnects attributable to competition from CLECs. This data reflects on 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>
ALLTEL	Staff's 1st RPD	Yes.	This data reflects Alltel's material and

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	No. 15: Col A, lines 19a-f; Col B, lines 4-7, 11-14, 17-19 and 19a-f; Col C, lines 19 C, F.	Rule 25.22.006(4)	labor costs for NIDs and reflects competitive cost information not available to Alltel for its competitors. Alltel is not privy to this cost information for 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	Staff's 1st RPD No. 18: page 1, lines 1-29, Col A-C, F-G; page 2, lines 1-6, Col A-C, F-G.	Yes. Rule 25.22.006(4)	Reflects Alltel's access lines and revenues from 1R rate on an exchange basis. 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	Staff's 1st RPD No. 19a (company specific inputs): pages 1-24, lines 1-27, all columns (A-I or J); page 25, lines 1-27, Col A-D.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI costs and inputs (lines, investments by types, costs, expenses, network units, billing units) by wire center for each of Alltel's wire centers in Florida. This data reflects competitive cost 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	Staff's 1st RPD No. 19a (company specific inputs): page 26, lines 1-26, all columns (A-K or M).	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI line costs by wire center for each of Alltel's wire centers in Florida. This data reflects competitive cost 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	Staff's 1st RPD No. 19a (company specific inputs): pages 27-41, line 1, all columns.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data (lines, investments by types, costs, expenses, network units, billing units). This data reflects competitive information for services subject to competition. Disclosure of this information will ham 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	Staff's 1st RPD No. 19a (company specific inputs): page 42, lines 1-24, Cols A & E; page 43, lines 1-24, Cols A-C; page 44, lines 1-12, Col A.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for loops costs and UNE expense assignments. This data reflects competitive 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	Staff's 1st RPD No. 19a (company specific inputs): page 48, Cols 1, 4, 7, 10, lines 5 & 6; page 49, Cols 33-65, all lines (1-73); page 50, cols 66-81, all lines (1-90).	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for CCC Factors. This data reflects competitive 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	Staff's 1st RPD No. 19a (company specific inputs): page 51, Col A, lines 1-3, 7-9, and Col B, lines 4-6, and Cols C-E, lines 10-30.	Yes, in part. Rule 25.22.006(4) No for the following: HAI data for cost of debt and equity (These numbers are cost of capital inputs) and HAI	Reflects Alltel's HAI data for cost of debt and equity, effective tax rate, corporate overheads and other tax rates, and HAI data for lives, salvage values and projected lives for depreciation purposes. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's

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		data for lives, salvage values and projected lives for depreciation purposes. These do not reflect confidential company information and also appear in direct testimony.	competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	Staff's 1st RPD No. 19a (company specific inputs): page 60, Col C, line 710; page 61, Col D, lines 7230, 7249.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for operating expense factors and revenues and same for operating other taxes. This data reflects competitive financial 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	Staff's 1st RPD No. 19a (company specific inputs): page 66, Col A, lines 17-46.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for different factors and categories. This data reflects competitive financial 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	Staff's 1st RPD No. 19a (company specific inputs): page 68, Col A, lines 1-3, 5-6.	Yes, in part. Rule 25.22.006(4) No for the following: HAI data for cost of debt, debt fraction, and cost of equity. These	Reflects Alltel's HAI data for cost of debt, debt fraction, cost of equity, corporate overhead factor and other taxes factor. This data reflects competitive financial 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

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		numbers are cost of capital inputs and do not reflect confidential company information. Also appear in direct testimony.	available, resulting in a competitive disadvantage to Alltel if its data is disclosed.
ALLTEL	Staff's 1st RPD No. 19a (company specific inputs): page 71, Col A, lines 9-52.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for expense/investment categories. This data reflects competitive financial 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	Staff's 1st RPD No. 20c: page 1, Col A-C, lines 1-78; Col E, lines 14, 20, 40-44, 66; Col D, lines 47-48; page 2, Col A, lines 1-26; Col B, lines 5-10, Col C, lines 1-15; Col D, lines 1-16; Col E, lines 1-10; Col F, lines 4-10, Col G, lines 4-10.	Yes. Rule 25.22.006(4)	Reflects Alltel's HAI data for expense/investment categories. This data reflects competitive financial 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	Staff's 1st IRR No. 13(b): page 1, Col B, lines 1-12.	Yes. Rule 25.22.006(4)	Reflects the names of companies that have submitted bona fide requests for interconnection or resale or other agreements with Alltel. Alltel maintains this information as confidential at the request of the company making the BFR, on grounds that competitors do not want their business plans released to the public or other competitors. Disclosure of this information will harm Alltel's business interests, by chilling the

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