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October 15, 1999

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VIA HAND DELIVERY

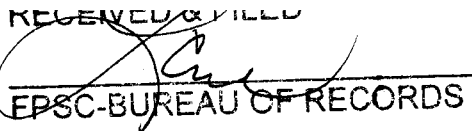
Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Number Utilization Study: Investigation Into Number Conservation
Measures, Docket No. 981444-TP

Dear Ms. Bayo:

Enclosed for filing are the original and 15 copies of Florida Cellular Service, Inc. d/b/a BellSouth Mobility, Inc.'s ("BMI") Notice of Intent to Request Confidential Classification of BMI's response to staff's data request in the above-referenced docket. Also enclosed are the following: (1) a separate, sealed envelope containing one copy of BMI's response to the data request on which the information for which BMI is requesting confidential classification is highlighted and a diskette containing BMI's response to the data request, and (2) two copies of BMI's response to the data request with the information for which BMI is requesting confidential classification redacted.

This notice of intent was filed in a docketed matter by or on behalf of a telecommunications company for Confidential Document No. 12660-99. The confidential material has been placed in locked storage pending staff advice on handling.

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Blanca S. Bayo
October 15, 1999
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For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration in this matter.

Very truly yours,

HOLLAND & KNIGHT LLP

A handwritten signature in black ink, appearing to read "K.D. Walker", with a long horizontal flourish extending to the right.

Karen D. Walker

Enclosure
KDW/

cc: Walter D'Haeseleer (via hand delivery)
John Cutting (via hand delivery)
Levent Ileri (via hand delivery)
Beth Keating (via hand delivery)
Diana Caldwell (via hand delivery)
All Parties of Records (via U.S. Mail)
William H. Brown (via fax)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Number Utilization Study: Investigation
Into Number Conservation Measures

Docket No. 981444-TP
Filed: October 15, 1999

**NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION**

Florida Cellular Service, Inc. d/b/a BellSouth Mobility Inc ("BMI"), by and through undersigned counsel, pursuant to Section 364.183, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this Notice of Intent to Request Confidential Classification of certain proprietary confidential business information contained in BMI's response to Florida Public Service Commission (the "Commission") staff's data request made in connection with the Commission's number utilization study.

By letter dated September 24, 1999, Commission staff requested that BMI complete two spreadsheets attached to the letter to assist the Commission in its study of number utilization of all area codes in Florida in an attempt to determine whether numbering resources are being used in an efficient manner. A copy of this letter is attached hereto as Exhibit "A." The letter requests that responses be submitted by October 15, 1999.

BMI is submitting its response to staff's data request in accordance with the September 24, 1999 letter. BMI's response to the data request, however, contains proprietary confidential business information as that term is defined in Section 364.183(3), Florida Statutes. Specifically, the data request requires BMI to reveal the identity of BMI's number blocks, the number of active numbers in each NXX,

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and BMI's projected growth of numbers. From this information, a competitor of BMI could determine the number of BMI's active customers in each NXX and BMI's projected customer growth. Thus, BMI is submitting its response to the data request under cover of this Notice of Intent to Request Confidential Classification.

BMI is submitting its response to the data request in strict accordance with the confidentiality requirements of Rule 25-22.006. Accordingly, BMI submits herewith: (i) a separate, sealed envelope, containing one copy of BMI's response to the data request with the information for which BMI intends to request confidential classification highlighted and a copy of BMI's response to the data request on diskette; and (ii) two copies of BMI's response to the data request with the information for which BMI intends to request confidential classification redacted. Only the redacted copies may be made available for public inspection. By submitting its response to staff's data request under cover of this Notice of Intent to Request Confidential Classification, BMI in no way shall have been deemed to have waived the confidentiality of the information contained therein that is the subject of this Notice.

Respectfully submitted,



Karen D. Walker
Florida Bar No. 0982921
HOLLAND & KNIGHT LLP
P.O. Drawer 810
Tallahassee, FL 32302
(904) 224-7000

Attorneys for BellSouth Mobility Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery * or United States Mail on the following this 15th day of October, 1999:

Diana Caldwell*
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Peggy Arvanitas
c/o RE/MAX First Class Inc.
620 Bypass Drive
Clearwater, FL 33764

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Rutledge Ecenia Underwood
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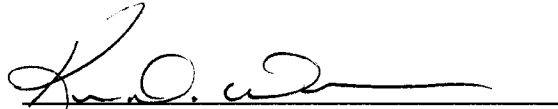
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c/o Nancy H. Sims
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Tallahassee, FL 32301-1556

Michael P. Goggin
150 West Flagler Street, Suite 1910
Miami, FL 33130



Karen D. Walker

TAL1 #206165 v1

STATE OF FLORIDA

Commissioners:
 JOE GARCIA, CHAIRMAN
 J. TERRY DEASON
 SUSAN F. CLARK
 JULIA L. JOHNSON
 E. LEON JACOBS, JR.



DIVISION OF
 TELECOMMUNICATIONS
 WALTER D'HAESELEER
 DIRECTOR
 (850) 413-6600

Public Service Commission

September 24, 1999

Re: Data Request in Docket No. 981444-TP


Dear Telecommunications Carrier:

Since 1995 the telecommunications industry in Florida has been in a continuous process of implementing new area codes. The Florida Public Service Commission (FPSC) believes that the adoption of number conservation measures is in the public interest, and the FPSC recently received some additional authority from the Federal Communications Commission in this regard. Therefore, the FPSC is undertaking a number utilization study of all area codes in Florida in an attempt to determine whether numbering resources are being used in an efficient manner. The results of this study will be discussed at a workshop scheduled for October 20, 1999 at 9:00 a.m. in Room 148 of the Easley Building.

In an attempt to simplify the data collection process, staff has drafted two spreadsheets (See Attachments I and II) and a list of applicable definitions. Your cooperation in completing this study is greatly appreciated. Please submit your response by **Friday, October 15, 1999**.

If you have any questions, please contact Mr. Levent Ileri at (850) 413-6562.

Sincerely,


 Walter D'Haeseleer
 Director

LI

Enclosures

cc: Sally Simmons
 John Cutting
 Levent Ileri
 Beth Keating
 Diana Caldwell

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EXHIBIT

"A"

For the purposes of data collection, the definitions used in the spreadsheet are:	
NPA	Number Plan Area (i.e., area code)
NXX	Prefix (i.e., the first three digits of a telephone number)
Contamination	Any block in which end user customers have been assigned telephone numbers
Number of Blocks With Less Than 10% Contamination	Example: In an NXX, there are 10,000 telephone numbers. If your company has assigned 1500 telephone numbers, then the ratio of 1500 to 10000 (=0.15) is the contamination rate. Multiplying this number by 100 yields the percent contamination, which in this case is 15%. This calculation would be repeated for every NXX within the same NPA. Similarly, in a 1,000-block, with 50 customers, the contamination is 50/1000 = 0.05, or 5%. Count the numbers of blocks where the contamination is less than 10%.
Disconnected Numbers	Telephone numbers which are available for reassignment
Reserved Numbers	Any telephone number reserved for special purposes (vanity numbers, test numbers, service numbers)
Reserved Blocks	Any 1,000-block that has been set aside by the Pooling Administrator for some specific future use or purpose
Average Growth	Average number of new NXXs or 1,000 blocks assigned per month

Company Name:

Prepared by:

Address:

Tel: () -
Fax: () -

Attachment I

Number of Assigned and Active Telephone Numbers for A by your company (excluding reserved numbers)	Total Number of Telephone Assigned Numbers for A by your company (including reserved numbers)	Total Number of NXXs your company is assigned in A	Total Number of NXXs in Use for A by your company	Projected Average Monthly Growth of NXXs in A	Number of Available NXXs with less than 10 percent Contamination	Number of 1,000 Blocks which are assigned and actively used for A by customers (excluding reserved numbers)	Total Number of 1,000 Blocks which are assigned for A by customers (including reserved numbers)	Projected Average Monthly Growth in 1,000 Blocks Used in A	Number of Available 1,000 Blocks with less than 10 percent Contamination in A

Please provide the spreadsheet on an IBM compatible 3.5" or 100-MB Zip disk using Excel or FoxPro

Attachment II

P. 01/01

FAX NO.

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Company Name*:

Prepared by:

Tel: () - Fax: () -

Address:

Standard Aging Period for Disconnected Telephone Numbers : _____ days

Average Actual Aging Period for Disconnected Telephone Numbers: _____ days

NPA	NXX	Number of Aging Numbers	Number of Telephone Numbers Available for Reassignment	Number of Reserved Telephone Numbers	0000-0999	1000-1999	2000-2999	3000-3999	4000-4999	5000-5999	6000-6999	7000-7999	8000-8999	9000-9999
Please enter the number of assigned and active telephone numbers under each 1,000-block														

* Please provide the spreadsheet on an IBM compatible 3.5" or 100-MB Zip disk using Excel or FoxPro