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> > May 18, 2000

OF COUNSEL: CHARLES F. DUDLEY

GOVERNMENTAL CONSULTANTS: PATRICK R. MALOY AMY J. YOUNG

MAY 18 PH 4:

HAND DELIVERY

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Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Re: Docket No. 981444-TP

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Allegiance Telecom of Florida, Inc. ("Allegiance") are the original and fifteen copies of Allegiance's Request for Confidential Classification.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

Kenneth A. Hoffman

(x-ref. osald -00)

This confidentiality request was filed by or for a "telco" for DN <u>O</u>. 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.

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#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Number Utilization Study: Investigation into Number Conservation Measures.

Docket No. 981444-TP

Filed: May 18, 2000

#### ALLEGIANCE TELECOM OF FLORIDA, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Allegiance Telecom of Florida, Inc. ("Allegiance"), by and through its undersigned counsel, and pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification within twenty-one days of filing its Notice of Intent to Request Confidential Classification, and states:

1. Allegiance requests that the document attached hereto as Attachment "A" be classified as "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes (1997). Attachment "A" is an edited version of the document on which the information asserted to be confidential has been blocked out by the use of an opaque marker. An unedited version of the information contained in Attachment "A" was submitted to the Division of Records and Reporting on April 28, 2000, together with Allegiance's Notice of Intent to Request Confidential Classification for this document and is provided herewith under a separate cover marked "confidential" with the information asserted to be confidential highlighted in yellow.

2. The attached document contains existing and projected NXX Code utilization information for Allegiance's operations in Florida, including, for each NXX code, data reflecting: the number of 1,000 block-demand per month from May, 2000 through October, 2001; the number of available 1,000 blocks with less than 10% contamination, the number of aging numbers, number of telephone numbers available for reassignment, number of reserved telephone numbers, and DOCUMENT NUMBER-DATE

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number of assigned and active telephone numbers for each 1,000 block. Allegiance's current and projected utilization of NXX codes is "proprietary confidential business information" as contemplated by Section 364.183(3)(e), Florida Statutes (1999), because such information is intended to be and is treated by Allegiance as highly sensitive, private and confidential information and the public disclosure of such information would cause harm to Allegiance's competitive interests and business operations by enabling Allegiance's competitors to analyze such information and gain knowledge concerning Allegiance's market share and marketing strategy.

3. Allegiance has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been publicly disclosed or released.

WHEREFORE, based on the foregoing, Allegiance respectfully requests that the Commission grant this request for confidential classification by determining that the information described above and filed herewith is proprietary confidential business information, exempt from disclosure under the public records laws of the State of Florida, and protected from disclosure while it is maintained at the Commission.

Respectfully submitted,

KENNETH A. **GO**FFMAN, ESQ. JOHN R. ELLIS, ESQ. Rutledge, Ecenia, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, Florida 32302 (850) 681-6788 (Telephone) (850) 681-6515 (Telecopier)

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. Mail this 18<sup>th</sup> day of May, 2000, to the following:

Diana Caldwell, Esq. Division of Legal Services 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

Mr. Levent Ileri Division of Communications Florida Public Service Commission 2540 Shumard Oak Boulevard Room 270G Tallahassee, FL 32399-0850

By: Tu FFMAN, ESQ.

Allegiance\reqest

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Number Plan Ares (.e. eres code) Press (.e., the sist three tighs of a telephone number) NXX Any block in which and user customers have been assigned telephone numbers. Contamination Example: In an NOX, there are 10,000 telephone numbers. If your company has assigned Number of Blocks With Less Than 10% Contamination 1500 telephone numbers, then the ratio of 1500 to 10000 (=0.15) is the contamination net. Multiphong 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. Units securation mound be repeated for every ALX within the same NPA. Similarly, in a 1,000-block, with 50 costomers, the contamination is 50/1000 = 0.05, or 5%. Count the numbers of blocks where the contamination is less than 10%. Telephone numbers which are systable to reassignment Any telephone number reserved for special purposes (varity numbers, test numbers, service numbers) Disconnected Numbers Any 1,000-block their has been set safe by the Pooling Administrator for some specific structe use or purpose Reserved Numbers Reserved Blocks Average Growth Average number of new NXXs or 1,000 blocks assigned per month

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### STATE OF FLORIDA



Division of Records & Reporting Blanca S. Bayó Director (850) 413-6770

## Public Service Commission

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то:	<u>J. J. J. J. Marken</u>		
FROM: _	· · · · · · · · · · · · · · · · · · ·	<u></u>	, Division of Records and Reporting
RE: Ackno	owledgment of Rec	eipt of Co	nfidential Filing
Thi	is will acknowledge	receipt of	a CONFIDENTIAL DOCUMENT filed in Docket No.
1-114	<u>177</u> or	(if filed in	an undocketed matter) concerning $/$
in la	and the second and th	0.1	, and filed on behalf of

The document will

be maintained in locked storage.

Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6744.

PSC/RAR 19 (3/00)

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Commissioners:

J. TERRY DEASON

SUSAN F. CLARK E. LEON JACOBS, JR. LILA A. JABER

JOE GARCIA, CHAIRMAN

PSC Website: http://www.floridapsc.com