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January 23, 2002

VIA HAND DELIVERY

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

Re: Docket No. 990649A-TP

Dear Ms. Bayo:

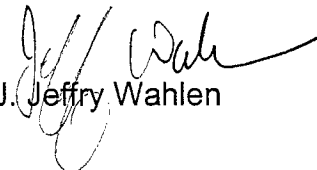
Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Communication, Inc.'s Statement of Positions.

We are also submitting the Statement of Positions on a 3.5" high-density diskette using Microsoft Word 97 format, Rich Text.

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,


J. Jeffrey Wahlen

Enclosures

cc: All Parties of Record

DOCUMENT NUMBER-DATE

00827 JAN 23 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into pricing of
unbundled network elements

DOCKET NO. 990649A-TP
FILED: January 23, 2002

**ALLTEL COMMUNICATIONS, INC.'S
STATEMENT OF POSITIONS**

In accordance with the Prehearing Officer's instructions at the prehearing conference on January 17, 2002, ALLTEL Communications, Inc. ("ALLTEL") submits the following basic position and position issues for the prehearing order:

BASIC POSITION

ALLTEL is monitoring this phase of this proceeding, and has been excused by the Prehearing Officer from participation in the hearing. ALLTEL has not prefiled testimony and takes no position on the issues to be decided in this phase of this proceeding.

- ISSUE 1:**
- a) Are the loop cost studies submitted in BellSouth's 120-day filing compliant with Order No. PSC-01-1181-FOF-TP?
 - b) Should BellSouth's loop rate or rate structure, previously approved in Order No. PSC-01-2051-FOF-TP, be modified? If so, to what extent, if any, should the rates or rate structure be modified?

- POSITION:**
- a) No position.
 - b) No position.

- ISSUE 2:**
- a) Are the ADUF and ODUF cost studies submitted in BellSouth's 120-day compliance filing appropriate?

b) Should BellSouth's ADUF and ODUF rates or rate structure, previously approved in Order No. PSC-01-2051-FOF-TP, be modified? If so, to what extent, if any, should the rates or rate structure be modified?

POSITION: a) No position.
b) No position.

ISSUE 3: a) Is the UCL-ND loop cost study submitted in BellSouth's 120-day filing compliant with Order No. PSC-01-1181-FOF-TP?
b) What modifications, if any, are appropriate, and what should the rates be?

POSITION: a) No position.
b) No position.

ISSUE 4: a) What revisions, if any, should be made to NIDs in both the BSTLM and the stand-alone NID cost study?
b) To what extent, if any, should the rates or rate structure be modified?

POSITION: a) No position.
b) No position.

ISSUE 5: a) What is a "hybrid copper/fiber xDSL-capable loop" offering, and is it technically feasible for BellSouth to provide it?
b) Is BellSouth's cost study contained in the 120-day compliance filing for the "hybrid copper/fiber xDSL-capable loop offering appropriate?
c) What should the rate structure and rates be?

POSITION: a) No position.
b) No position.

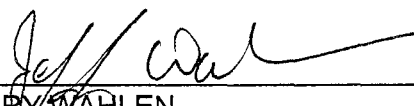
ISSUE 6: In the 120-day filing, has BellSouth accounted for the impact of inflation consistent with Order No. PSC-01-2051-FOF-TP?

POSITION: No position.

ISSUE 7: Apart from Issues 1-6, is BellSouth's 120-day filing consistent with the Orders in this docket?

POSITION: No position.

Respectfully submitted this 23rd day of January, 2002.



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ATTORNEYS FOR ALLTEL COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail transmission, U. S. Mail, or hand delivery (*) this 23rd day of January, 2002, to the following:

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