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ORIGINAL

September 5, 2002

RECEIVED-FPSC
02 SEP -5 AM 11:56
COMMISSION
CLERK

BY HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shurnard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 02000-TP

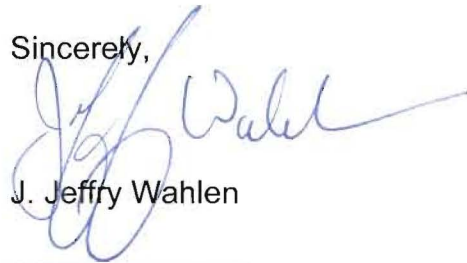
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Communications, Inc.'s Request for Confidential Classification.

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

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- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- EGR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

This request for confidentiality was filed by or on behalf of a telecommunications company for undocketed Confidential Document No. ~~09383-02~~. No ruling is required unless the material is subject to a request per 119.07, FS. Your division director must obtain written permission from the EXD/Tech for you to access the confidential material.

RECEIVED & FILED

RJM
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09382 SEP-5 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

DOCKET NO. 020000-TP
FILED: 08/05/2002

ALLTEL COMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

ALLTEL Communications, Inc. ("ALLTEL" or the "Company"), pursuant to Section 364.183, Florida Statute, and Rule 25-22.006, Florida Administrative Code, hereby files this Request for Confidential Classification, and states:

1. ALLTEL is a telecommunications company with its principal place of business in Florida in Jacksonville, Florida. Pleadings, orders, notices and other papers filed or served regarding this request should be served upon:

Betty Willis	J. Jeffry Wahlen
ALLTEL Corporate Services, Inc.	Ausley & McMullen
One Allied Drive	P. O. Box 391
Little Rock, AR 72203-2177	Tallahassee, FL 32302

2. On June 3, 2002, the Florida Public Service Commission sent to the Company a data request requesting information for use in the preparation of the Commission's next Local Competition Report to the Florida Legislature ("Data Request"). The Data Request seeks "data directly related to matters within the commission's jurisdiction in the form specified by the commission..." within the meaning of Section 364.183(1), Florida Statutes.

3. On August 16, 2002, the Company filed its Confidential Response to the Data Request ("Response") with the Division of Commission Clerk and Administrative Services ("Clerk"), together with a Notice of Intent to Request Confidential Classification for portions of

its Response. Therein, the Company asserted that certain information therein was confidential and designated the confidential information by highlighting it with a yellow marker. A non-confidential version (redacted) of the Response was contemporaneously delivered to the Commission's Office of Market Monitoring & Strategic Analysis. Thus, under Rule 25-22.006(5), Florida Administrative Code, the Commission is required to keep confidential and exempt from public disclosure the information asserted to be confidential by ALLTEL under the procedures in Section 25-22.006(5), Florida Administrative Code.

4. In addition, in accordance with the procedures set forth in Section 25-22.006(4), Florida Administrative Code, the Company asserts that the highlighted information in its Response is "proprietary confidential business information" within the meaning of Section 364.183, Florida Statutes, and requests that the Commission keep that information confidential and exempt from public disclosure in accordance with Section 25-22.006(4), Florida Administrative Code. Two edited versions of the data request with the confidential information redacted are attached as Exhibit "A." Another copy of the Response with the confidential information highlighted is attached as Exhibit "B." The line-by-line identification and justification required by Rule 25-22.006(4)(c), Florida Administrative Code, is attached as Exhibit "C." The material for which confidential classification is claimed and sought is intended to be and is treated by the Company as private and has not been disclosed.

WHEREFORE, ALLTEL Communications, Inc. respectfully requests that the Commission grant this Request for Confidential Classification.

Respectfully submitted this 5th day of September, 2002.



J. JEFFRY WAHLEN
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
850/425-5471

ATTORNEYS FOR ALLTEL COMMUNICATIONS,
INC.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

DOCKET NO. 020000-TP
FILED: 08/05/2002

ALLTEL COMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

~~Two~~ Edited Versions with Confidential Information Redacted

One


Exhibit A

CONFIDENTIAL**ALLTEL COMMUNICATIONS, INC. Responses To the FPSC
2002 Alternative Local Exchange Carrier (ALEC) Data Request**

1. Are you currently providing residential or business service to customers in Florida that complies with the above definition of basic local service?

Yes.

- a. To how many residential customers are you providing basic local service in Florida and what are your current rates?

As of June 30, 2002 ALLTEL has 1,302 residential access lines in service in Jacksonville, Florida. Although we no longer offer residential calling plans, the grand fathered rates are as follows: One line with full feature package (13 features included, plus basic voicemail)\$39.95; One line with feature package and long distance minutes \$46.00; 2 line convience package \$63.00; 2 line convience package and LD or internet option \$78.00.

- b. To how many business customers are you providing basic local service in Florida and what are your current rates?

As of June 30, 2002, ALLTEL has 4,647 business access lines in Jacksonville, Florida. Rates range from \$23.80 per line to 47.60 per line depending on the type of service and term length.

2. Are you currently providing types of local service (business or residential) in Florida that may not meet Florida's statutory definition of basic local service?

Yes.

- a. Please describe each of the forms of local service you are providing to residential customers in Florida, where you are offering these services and indicate your current rates.

As of February 15, 2001 ALLTEL no longer offers residential phone service in Jacksonville, Florida. However, we will continue to support our existing customer base.

- b. Please describe each of the forms of local service you are providing to business customers in Florida, where you are offering these services and indicate your standard rates.

Bundle service offerings, DS1 level service provisioning local service, long distance services, and data services via one circuit. Rates for access lines delivered on the bundled T1 begin at \$24.50 per line for a one-year term agreement and a 15% discount per line for a three-year term agreement.

3. Do you actively market your local services to Florida residential customers? **No.**

- a. If not, please explain why.

As of February 15, 2001, ALLTEL ceased adding new residential customers to focus solely on the business community. However, we will continue to support our existing customer base.

4. Does your company offer xDSL? If so, please indicate, by exchange, the number of xDSL lines your company provides and explain how your company's various service offerings are priced.

In Jacksonville, Florida ALLTEL does not offer xDSL.

5. Are you offering or providing voice over DSL (VoDSL) service?
In Jacksonville, Florida ALLTEL does not offer VoDSL.

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6. Please describe the method (s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.).
- a. Please indicate, by exchange and respective wire center, the number of incumbent local exchange carrier (ILEC) access lines you are reselling to residential customers.
In Jacksonville, Florida ALLTEL is not reselling any residential access lines.
 - b. Please indicate, by exchange and respective wire center, the number of ILEC Access lines you are reselling to business customers.
In Jacksonville, Florida ALLTEL has resale in the following exchanges: 904-223, 904-264, 904-272 (2), 904-768, 904-744, 904-272, 904-713, 904-757, 904-992, 904-280, 904-242, 904-276, 904-278 (2), 904-743, 904-270, 904-751, 904-824, 386-446, 904-529; The Bellsouth wire center is unknown by ALEC. All exchanges have one customer unless otherwise indicated (2) as such.
 - c. Please indicate, by exchange and respective wire center the, the types of unbundled network elements, if any, you are obtaining from the incumbent ILEC.
In Jacksonville, Florida ALLTEL obtains DSO, DS1 UNE's in all exchanges of the following wire centers; Arlington, San Jose, San Marco, Wesconnett, Beachwood, Clay, Normandy, Riverside, Avenues, and Mandarin-Loretto.
 - d. Please indicate, by exchange and respective wire center, the number of unbundled local loops, by type, if any, you are obtaining from the incumbent ILEC.
Requested information in not available.
 - e. Please indicate, by exchange and respective wire center, the number of access lines you are serving through UNE loop combinations, such as the UNE Platform. **In Jacksonville, Florida ALLTEL is not obtaining UNE loop combinations.**
 - f. Please indicate the types of facilities deployed by your in Florida to provide local telephone services, and indicate where these facilities are deployed. **In Jacksonville, Florida ALLTEL has a leased OC-48 with access nodes in ten BellSouth central offices. (Arlington, San Jose, San Marco, Wesconnett, Beachwood, Clay, Normandy, Riverside, Avenues, And Loretto).**
 - g. If known, please indicate the number of access lines by exchange, separately for residential and business customers, provisioned solely over company-owned facilities.
In Jacksonville, Florida ALLTEL has approximately 500 on-net lines, or those provisioned solely over company owned facilities.
 - h. Please indicate, by exchange, the number of business access lines you serve that are provided to Internet service providers.

In Jacksonville, Florida ALLTEL provides no lines to internet service providers other than ALLTEL.

- i. Please indicate, by exchange, the number of business access lines you serve that are provided to voicemail service providers.

In Jacksonville, Florida ALLTEL provides no access lines to voicemail service providers other than ALLTEL.

- 7. Referring back to your responses to question number 6, please provide by subpart where Applicable, the number of voicegrade equivalent lines that you are providing.
In Jacksonville, Florida ALLTEL is providing approximately 4,647 Business Lines and 1,302 Residential access lines.

- 8. a. Please indicate the number and location of switches you have located in Florida (if any) used to provide services to customers in Florida, identify whether they are circuit or packet switches, and identify the manufacturer.
ALLTEL has one switch in Jacksonville. It is a Lucent 5ESS.

- b. Please indicate the projected number and location of circuit and packet switches that you expect to locate in Florida within the next five years.
ALLTEL does not anticipate adding additional switches in the state of Florida at this time. However we constantly review position and this could change.

- c. If applicable, please indicate if and where you have deployed transport Facilities, and describe the technology(ies) deployed.
Our Lucent 5 ESS transport switch is located in Jacksonville Florida.

- 9 a. For each exchange where you are providing any form of residential local telephone service, please identify by exchange and respective wire center, the number of residential access lines served as of June 30, 2002.
In Jacksonville, Florida ALLTEL has approximately 1,302 non-resold residential access lines in service as of June 30, 2002.

- b. For each exchange where you are providing any form of business local telephone service, please identify by exchange and respective wire center, the number of business access lines served as of June 30, 2002.
In Jacksonville, Florida ALLTEL is providing approximately 4,647 Business Lines out of the Jacksonville exchange in the following BellSouth central offices; Arlington, San Jose, San Marco, Wesconnett, Beachwood, Clay, Normandy, Riverside, Avenues, and Loretto.

- 10. For billing and accounting purposes, do you differentiate between residential and business customers.
ALLTEL differentiates between residential and business customers for billing, reporting and accounting purposes.

- 11. Have you experienced any significant barriers in entering Florida's local exchange market/ Please list and describe any obstacles or barriers encountered.
No response.

- 12. Have you experienced any difficulties involving any agreements you may have with incumbent LECS? If so, please describe any significant problems encountered.

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In Jacksonville, we have experienced significant obstacles in gaining timely access to our co-locations, particularly those which are virtual.

13. Please describe your long-term (5 years) business strategy, including whether you intend to change your method of provisioning (e.g., from resale/mixed to all UNEs to facilities-based).

We anticipate a 10% growth rate over the next 5 years. Economic and industry trends over the next five years will determine our method of provisioning.

14. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned? For each code that you been assigned as of June 30, 2002, please indicate how many numbers have been assigned and how many of those numbers have active status. If you have been assigned NXX codes, please identify where they have been homed for rating and routing purposed.

In Jacksonville , Florida ALLTEL has been assigned the 854 NXX. These numbers are housed in our Lucent 5ESS switch for rating and routing. ALLTEL has assigned approximately 6,270 of these numbers and there are approximately 5,770 which currently have an active status.

15. a. At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn a service? If yes, please identify the service(s) prices, and exchange, and discuss the reasons for the decision.

An executive decision was made in January 2002 to close 2 of the existing ALLTEL CLEC Markets. Those markets were Gainesville and Tallahassee. ALLTEL constantly evaluates all areas of its business. This was simply a business decision based on the consideration of costs that ALLTEL incurs in providing local phone service as well as the trouble we incurred in there being adequate facilities to serve our customers. The pricing for business local phone services varies depending on number of lines, bandwidth and contract length.

- b. During the last 12 months have you expanded your service offerings in Florida? If so, please list the new offerings , if they are residence or business (or both), their prices and exchanges where you have offered the services.

In the Jacksonville exchange ALLTEL has expanded it business offerings to include a bundled T1 (local, long distance, internet). The pricing varies depending on number of lines , bandwidth and contract length.

16. a. Please list your primary line of business.

Even though Cellular is the core product, ALLTEL does offer an array of valuable products – such as Local Phone Service, Long Distance, and a host of Data services.

- b. If you are involved in providing cable television in Florida, do you offer any package plans combining cable television and local telephone services?

ALLTEL is not involved in providing cable television service.

17. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on any major obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles. We are also seeking comment on alternative methods to evaluate the level of competition in Florida (e.g., use of the E911 databases, ect.) as well as comments or information on intermodal local competition (e.g. wireless, cable, telephony).

The lack of consistent Directory practices cause problems to both the ALEC and their customers.

18. If your company filed a Form 477 with the Federal Communications Commission in March 2002, please enclose a copy of the completed Form 477 with your response to this data request.

A separate Form 477 was not filed. See ALLTEL Florida, Inc. responses.

19. Please provide a copy of the most up-to-date information that your company has provided to Wall Street analysts for the period July 1, 2001 through June 30, 2002 that discusses the number of access lines you provide as an ALEC in Florida. If the numbers differ from what you are reporting to the Florida Public Service Commission, please explain the differences.

Information not available

20. For the year ending December 31, 2001, please identify your total revenue from local service, broken out by business and residence.

Local Service Revenue: \$2,833,716. Not available broken out by business and residence.

21. As of December 31, 2001, how much (in thousands of dollars) have you invested in your network?

ALLTEL has invested a total of [REDACTED]

22. Has your company filed either Chapter 7 or Chapter 11 bankruptcy in the past, are you currently operating under Chapter 7 or Chapter 11 protection, or do you anticipate possibly filing for Chapter 7 or Chapter 11 bankruptcy? If so, please provide relevant dates and details about the filing, including which chapter.

We have not and do not anticipate filing Chapter 7 or 11 bankruptcy.

CONFIDENTIAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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ALLTEL COMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

One Version with Confidential Information Highlighted

Exhibit B

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filings for 2002

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ALLTEL COMMUNICATIONS, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Justification

<u>Page</u>	<u>Line(s)</u>	<u>Column(s)</u>	<u>Explanation</u>
5	21	Dollar Value	This data reflects the dollar value of the investment made by the Company in Florida. This data is confidential because disclosure could harm the Company for the reasons explained in Note 1.

Note 1

The highlighted information reflects the Company's investment by the Company in Florida. By its very nature, the data demonstrates the extent to which the Company has invested in the Florida market. This data is valuable investment information that can be used by competitors and potential competitors to evaluate whether, when, where and how to compete in the relevant market. Information of this type and in this detail for the Company's competitors is not publicly available; therefore, public disclosure of the data will place the Company at a competitive disadvantage, thereby harming the Company.