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ORIGINAL

April 14, 2003

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COMMISSION
CLERK

VIA HAND DELIVERY

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

Re: Docket No. 981834-TP and 990321-TP

Dear Ms. Bayo:

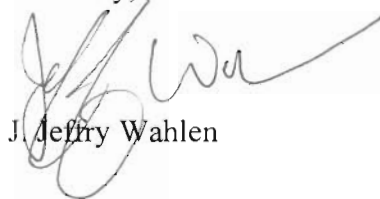
Enclosed for filing in the above dockets are the original and fifteen (15) copies of ALLTEL Communications, Inc.'s:

1. Answers to Staff's First Set of Interrogatories (public version) and
2. Response to Staff's First Request for Production of Documents.

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

JJW/jh
Enclosures
cc: All Parties of Record (w/encls.)

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers
for Commission action to support local
competition in BellSouth Telecommunications,
Inc.'s service territory

DOCKET NO. 981834-TP

In re: Petition of ACI Corp d/b/a Accelerated
Connections, Inc. for generic investigation to
ensure that BellSouth Telecommunications, Inc.,
Sprint-Florida, Incorporated, and GTE Florida
Incorporated comply with obligation to provide
alternative local exchange carriers with flexible,
timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP
FILED: April 14, 2003

**ALLTEL COMMUNICATIONS, INC.'S
RESPONSE TO STAFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rule of Civil Procedure, ALLTEL Communications, Inc. ("ALLTEL" or the "Company"), by and through undersigned counsel, responds as follows to Staff's First Request for Production of Documents. ALLTEL Communications, Inc. was granted leave to intervene in this docket by Order No. PSC-99-2152-PCO-TP on November 3, 1999.

REQUESTS FOR PRODUCTION

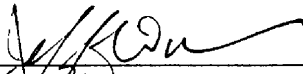
- 1. Produce all documents furnished or provided by ALLTEL Communications Services, Inc. or on ALLTEL Communications Services, Inc.'s behalf to its shareholders, accountants, auditors, creditors, or to stock analysts referring or relating to the lives, net salvage values, or depreciation rates used by ALLTEL Communications Services, Inc. for depreciation purposes.**

Response:

ALLTEL Communications, Inc. has not provided any documents to shareholders, accountants, creditors or stock analysts referring or relating to the lives, net salvage

values or depreciation rates used by ALLTEL. However, ALLTEL Communications, Inc. will file on April 14, 2003 a schedule showing the lives and net salvage values used for internal accounting purposes with the Division of Commission Clerk pursuant to a Notice of Intent to Request Confidential Classification.

DATED this 14th day of April, 2003



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jwahlen@ausley.com

Attorneys for ALLTEL Communications, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by U. S. Mail or hand delivery (*) this

14th day of April, 2003, to the following:

Beth Keating *
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

AT&T
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Atlanta, GA 30309-3523

AT&T
Virginia C. Tate
1200 Peachtree Street, N.E., Suite 8100
Atlanta, GA 30309

BellSouth Telecommunications, Inc.
Nancy B. White/E. Earl Edenfield, Jr.
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

CompTel
Terry Monroe/Genevieve Morelli
1900 M Street, NW, Suite 800
Washington, DC 20036

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Mr. Charles E. Watkins
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Tallahassee, FL 32303

Florida Competitive Carriers Assoc.
c/o McWhirter Law Firm
Vicki Kaufman
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Tallahassee, FL 32301

Florida Digital Network, Inc.
Matthew Feil, Esquire
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Florida Public Telecommunications
Association, Inc.
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Mr. John D. McLaughlin, Jr.
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Kentucky Public Service Commission
Deborah Eversole, General Counsel
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Frankfort, KY 40602

Lockheed Martin IMS
Anita L. Fourcard
Communications Industry Services

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MCImetro Access Transmission Services LLC
Ms. Donna C. McNulty
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MediaOne Florida Telecommunications, Inc.
c/o Laura L. Gallagher
Laura L. Gallagher, P.A.
101 E. College Avenue, Suite 302
Tallahassee, FL 32301

Mpower Communications Corp.
Mr. Richard Heatter
175 Sully's Trail, Suite 300
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Network Telephone Corporation
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Pensacola, FL 32501-5937

Rutledge Law Firm
Kenneth Hoffman
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Limited Partnership
Susan S. Masterton/Charles J. Rehwinkel
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MC: FLTLHO0107
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Miami, FL 33133

Telecommunications Resellers Assoc.
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c/o Miller Isar, Inc.
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Gig Harbor, WA 98335

Time Warner Telecom
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Regulatory Affairs, Southeast Region
233 Bramerton Court
Franklin, TN 37069

Tallahassee, FL 32301-2960

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Messer law Firm
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Network Access Solutions Corporation
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Pennington Law Firm
Peter Dunbar/Barbara Auger/Marc Dunbar
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Tallahassee, FL 32301

Shook, Hardy & Bacon LLP
Rodney L. Joyce
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Washington, DC 20005-2004

Sprint-Florida, Incorporated
Mr. F. B. (Ben) Poag
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TCG South Florida
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1200 Peachtree Street, N.E., Ste. 8026
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Time Warner Telecom
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Maitland, FL 32751

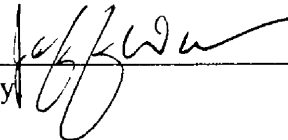
U.S. Department of Justice/
Telecom Task Force
Anu Seam
Antitrust Division
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Wilmer Law Firm
C Ronis/D. McCuaig/J. Frankel
2445 M Street, N.W.
Washington, DC 20037-1420

Attorney  _____

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive Carriers
for Commission action to support local
competition in BellSouth Telecommunications,
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DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated
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Incorporated comply with obligation to provide
alternative local exchange carriers with flexible,
timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP
FILED: April 14, 2003

**ALLTEL COMMUNICATIONS, INC.'S
ANSWERS (PUBLIC VERSION) TO STAFF'S FIRST
SET OF INTERROGATORIES**

ALLTEL Communications, Inc. ("ALLTEL" or the "Company"), pursuant to Rule 25-22.034, Florida Administrative Code, and Florida Rule of Civil Procedure 1.340, hereby provides the following answers to Staff's First Set of Interrogatories, served on March 25, 2003 ("Staff's First Set"). ALLTEL Communications, Inc. was granted leave to intervene in this docket by Order No. PSC-99-2152-PCO-TP on November 3, 1999. Bettye J. Willis, Manager – State Government Affairs, provided the answers to these interrogatories.

**ALLTEL
DOCKET NOS. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 1
PAGE 1 OF 1**

- 1. Does ALLTEL Communications Services, Inc. provide telephone exchange service in the State of Florida? If yes, describe with particularity the network ALLTEL Communications Services, Inc. uses to provide such service in Florida.**

Response: Yes. ALLTEL Communications, Inc's core switching fabric is done with a Lucent 5ESS switch located in Jacksonville at our facility. ALLTEL has Zone Access Nodes that are switch remotes off the 5ESS collocated at BellSouth switch locations. (Zone purchased the Access Node product from Northern Telecom) These Access Nodes connect to our host 5ESS via Bell South OC48 Sonnet Ring, which we lease from Bell South. Bell South provides the cable loop that carries dial tone from our Access Node to the customer premise.

We also offer T1 PRI and T1 trunking to customers. This service is provided from our 5ESS switch and is sent over the Bell South OC48 ring and Bell South exchange cable to the customer. Bell South provides maintenance on the OC48 ring and it's exchange cable.

ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 2
PAGE 1 OF 1

2. If ALLTEL Communications Services, Inc. owns or operates any switches that it uses to provide telephone exchange service in the State of Florida,
- a. Please describe the type of switch (e.g., digital electronic, analog electronic, ATM) ALLTEL Communications Services, Inc. uses or operates to provide telephone exchange service in Florida.
 - b. Please provide the depreciation lives by category of equipment used by ALLTEL Communications Services, Inc. for its switches, including the extent to which such lives vary depending upon the type of switch involved (e.g., digital, analog, ATM, etc.). In answering this Interrogatory, please identify all documents referring or relating to the lives used by ALLTEL Communications Services, Inc. for depreciation purposes for the switches it owns or operates to provide telephone exchange service in Florida.

Response:

- a. A Lucent 5ESS digital switch is used to provide service to our CLEC customers in Florida. Subtending Zone digital access nodes are remotes in collocated facilities.
- b. For the digital switch described in 2a. above, the depreciation life is [CONFIDENTIAL] months using the Straight Line Depreciation method.

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 3
PAGE 1 OF 1**

- 3. Does ALLTEL Communications Services, Inc. own or operate any cable that it uses to provide telephone exchange service in the State of Florida? If yes, please describe the type of cable in place (e.g., fiber cable, coaxial cable, metallic cable, hybrid/coaxial cable, etc.).**

Response: Calls connecting to ALLTEL's network use ALLTEL's fiber network. All other calls terminating or originating to the 5ESS switch use the Sonnet OC48 ring ALLTEL leases from Bell South.

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 4
PAGE 1 OF 1**

- 4. Please provide the lives and salvage values ALLTEL Communications Services, Inc. uses for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of cable (e.g., fiber cable, metallic cable, coaxial cable, hybrid/coaxial cable, etc.). In answering this Interrogatory, please identify all documents referring or relating to the lives used by ALLTEL Communications Services, Inc. for depreciation purposes for the cable it owns or operates to provide telephone exchange service in Florida.**

Response: The depreciation life of the Fiber Optic Ring used by ALLTEL Communications, Inc. in the provision of telephone exchange service in Florida is [CONFIDENTIAL] months using the Straight Line Depreciation Method with a net salvage value of [CONFIDENTIAL].

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 5
PAGE 1 OF 1**

- 5. Does ALLTEL Communications Services, Inc. own or operate any digital circuit equipment that it uses to provide telephone exchange service in the State of Florida? If yes, please describe the type of digital circuit equipment in place (e.g., carrier, optical, amplification, signaling).**

Response:

Yes. ALLTEL Communications, Inc. offers a “bundled packaged” T1 that can comprise switched and non-switched elements. This T1 can offer POTS, trunking, and Internet connectivity. The bandwidth from the different entities is combined through a Carrier Access Navigator located at our switch facility and sent to the customer’s premise over the leased OC48 Sonnet ring and exchange cable facilities provided by Bell South.

ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 6
PAGE 1 OF 1

6. Please provide the lives and salvage values ALLTEL Communications Services, Inc. uses for depreciation purposes for the circuit equipment it owns or operates to provide telephone exchange service in Florida, including the extent to which such lives vary depending upon the type of circuit (e.g., digital, optical, amplification, signaling). In answering this Interrogatory, please identify all documents referring or relating to the lives used by ALLTEL Communications Services, Inc. for depreciation purposes for the circuit it owns or operates to provide telephone exchange service in Florida.

Response:

The depreciable value of circuit equipment is included in the switch account. Thus, refer to the response to Interrogatory No. 2.b.

ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 7
PAGE 1 OF 1

7. **Please provide the lives and salvage values ALLTEL Communications Services, Inc. uses for depreciation purposes for the buildings it owns and uses to provide telephone exchange service in Florida. In answering this Interrogatory, please identify all documents referring or relating to the lives used by ALLTEL Communications Services, Inc. for depreciation purposes for the buildings it owns and uses to provide telephone exchange service in Florida.**

Response: ALLTEL does not own any buildings used for the purpose of providing telephone exchange service in Florida.

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 8
PAGE 1 OF 1**

8. How does ALLTEL Communications Services, Inc. determine the lives and salvage values for its equipment?

Response: Depreciable lives and salvage values are based on the average estimated useful lives for the equipment comprising each asset classification or account. These lives are determined by input from the Engineering groups as to the life expectancy of the equipment, and comparisons of those lives to the useful lives being used by other companies in the industry.

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 9
PAGE 1 OF 1**

9. **Verizon FL asserts through the testimony of Allen E. Sovereign that the depreciation lives and net salvage values it uses for financial reporting purposes should be used as the depreciation inputs in the collocation cost study. Does ALLTEL Communications Services, Inc. agree with Verizon? If not, please explain in detail why the depreciation lives and salvage values used by Verizon for financial reporting purposes are not appropriate to use in Verizon's cost study for collocation recurring rates.**

Response: ALLTEL has formed no opinion on the depreciation inputs in Verizon's collocation cost study.

**ALLTEL
DOCKET NO. 981834-TP, 990321-TP
STAFF'S FIRST SET
INTERROGATORY NO. 10
PAGE 1 OF 1**

10. Do the lives used by ALLTEL Communications Services, Inc. for depreciation purposes depict remaining lives, average service lives, or tax lives?

Response: The lives used by ALLTEL for depreciation purposes depict average service lives.

AFFIDAVIT

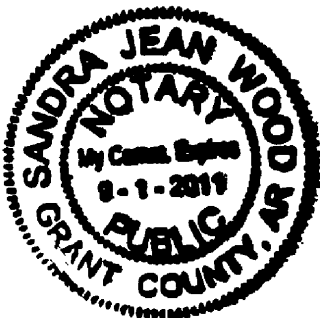
STATE OF ARKANSAS
COUNTY OF PULASKI


BEFORE ME, the undersigned authority, personally appeared BETTYE J. WILLIS, who deposed and said that she is the Manager - State Government Affairs and that ALLTEL Communications, Inc.'s answers to Staff's First Set of Interrogatories, Nos. 1 through 10, are correct to the best of her information and belief.

DATED this 14 day of April, 2003.


BETTYE J. WILLIS

The foregoing instrument was acknowledged before me this 14th day of April, 2003, by BETTYE J. WILLIS, who is personally known to me.




Notary

SANDRA JEAN WOOD
printed name

Notary Public
Title, Rank, Serial No., etc.

My Commission Expires: 9/1/11