AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

ORIGINAL

May 5, 2003

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: 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 Request for Confidential Classification. This request covers the confidential version of the Answers to Staff's First Set of Interrogatories and the document responsive to Staff's First Request for Production that were filed with a notice of intent to request confidential classification on April 14, 2003.

Exhibit "B" to the Request is a confidential version of the document for which confidential classification has been requested. One copy of Exhibit "B" is contained in a sealed envelope that is enclosed with this letter.

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.

This confidentiality request was filed by or for a "telco" for DNO YOS 3-0-3. 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.

Lx-ref. 03430-03

Sincerely,

Jeffry Wahlen

JJW/jh Enclosures

cc: All Parties of Record (w/encls. w/o Exhibit B)

RECEIVED & FILED

SC-BUREAU OF RECORDS

Request 5 0000 MENT ALMBER-DATE

04002. TIME 00

FPSC-COMMISSION CLERK

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

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. 981834-TP

DOCKET NO. 990321-TP FILED: May 5, 2003

ALLTEL COMMUNICATIONS, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

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

- 1. ALLTEL is an alternative local exchange telecommunications company that does business in the State of Florida. ALLTEL was granted leave to intervene in this docket by Order no. PSC-99-2152-PCO-TP on November 3, 1999.
- 2. On April 14, 2003, the Company filed a confidential version of its answer to Staff's First Set of Interrogatories and the document responsive to Staff's First Request for Production of Documents with the Division of Commission Clerk and Administrative Services ("Clerk"), together with a Notice of Intent to Request Confidential Classification. In so doing, the Company asserted that certain information therein was confidential and

designated the confidential information by highlighting it with a yellow marker. The Company's confidential filing was assigned Document Number 3430-03. Non-confidential versions (redacted) of the answers and document were contemporaneously delivered to the Clerk.

- 3. 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.
- 4. 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 included 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 to the public.

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

Respectfully submitted this 5th day of May, 2003.

J. JEFF WAHLEN Ausley & McMullen Post Office Box 391

Tallahassee, Florida 32302

850/425-5471

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 5th day of May, 2003, to the following:

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

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

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

Florida Cable Telecommunications Assoc., Inc. Michael A. Gross 246 E. 6th Avenue, Suit 100 Tallahassee, FL 32303

Florida Digital Network, Inc. Matthew Feil, Esquire 390 North Orange Avenue, Suite 2000 Orlando, FL 32801

Hopping Law Firm Richard Melson/Gabriel Nieto P. O. Box 6526 Tallahassee, FL 32314 AT&T Ms. Lisa A. Riley 1200 Peachtree Street, N.E., Ste. 8066 Atlanta, GA 30309-3523

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

Covad Communications Company Mr. Charles E. Watkins 1230 Peachtree Street, NE, 19th Floor Atlanta, GA 30309-3574

Florida Competitive Carriers Assoc. c/o McWhirter Law Firm Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301

Florida Public Telecommunications
Association, Inc.
Mr. David Tobin
c/o Tobin & Reyes
7251 West Palmetto Park Road, #205
Boca Raton, FL 33433-0656

Howell & Fisher
Robert Waldschmidt
Court Square Building
300 James Robertson Parkway
Nashville, TN 37201-1107

ITC\ DeltaCom Ms. Nanette S. Edwards 4092 South Memorial Parkway Huntsville, AL 35802-4343

KMC Telecom, Inc. Mr. John D. McLaughlin, Jr. 1755 North Brown Road Lawrenceville, GA 30043-8119

Lockheed Martin IMS Anita L. Fourcard Communications Industry Services 1200 K Street N.W. Washington, DC 20005

MCImetro Access Transmission Services LLC McWhirter Law Firm Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960

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 Pittsford, NY 14534-4558

Network Telephone Corporation Brent E. McMahan 815 South Palafox Street Pensacola, FL 32501-5937

Rutledge Law Firm Kenneth Hoffman P. O. Box 551 Tallahassee, FL 32302-0551

Intermedia Communications, Inc. Ms. Donna C.McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960

Kentucky Public Service Commission Deborah Eversole, General Counsel P. O. Box 615 Frankfort, KY 40602

MCI WorldCom Communications, Inc. Ms. Donna C. McNulty 1203 Governors Square Blvd., Suite 201 Tallahassee, FL 32301-2960

Joseph McGlothlin/Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301

Messer law Firm Floyd R. Self/Tracy Hatch P. O. Box 1876 Tallahassee, FL 32301-1876

Network Access Solutions Corporation Mr. Don Sussman Three Dulles Tech Center 13650 Dulles Technology Drive Herndon, VA 20171-4602

Pennington Law Firm Peter Dunbar/Barbara Auger/Marc Dunbar P. O. Box 10095 Tallahassee, FL 32301

Shook, Hardy & Bacon LLP Rodney L. Joyce 600 14th Street, N.W., Suite 800 Washington, DC 20005-2004

Sprint Communications Company/ Limited Partnership Susan S. Masterton/Charles J. Rehwinkel P. O. Box 2214 MC: FLTLHO0107 Tallahassee, FL 32316-2214

Supra Telecommunications & Information Systems, Inc. Mark E. Buechele 2620 S.W. 27th Avenue Miami, FL 33133

Telecommunications Resellers Assoc. Andrew Isar c/o Miller Isar, Inc. 7901 Skansie Avenue, Suite 240 Gig Harbor, WA 98335

Time Warner Telecom
Ms. Carolyn Marek
Regulatory Affairs, Southeast Region
233 Bramerton Court
Franklin, TN 37069

Verizon Florida, Inc. Mr. Richard Chapkis 201 N. Franklin Street, FLTC0007 Tampa, FL 33602

Verizon Select Services, Inc. Kimberly Caswell P. O. Box 110 FLTC0007 Tampa, FL 33601-0110 Sprint-Florida, Incorporated Mr. F. B. (Ben) Poag P. O. Box 2214 (MC FLTLHO0107) Tallahassee, FL 32316-2214

TCG South Florida Ms. Lisa A. Riley 1200 Peachtree Street, N.E., Ste. 8026 Atlanta, GA 30309-3579

Time Warner Telecom 2301 Lucien Way, Suite 300 Maitland, FL 32751

U.S. Department of Justice/ Telecom Task Force Anu Seam Antitrust Division 1401 H Street N.W., Ste. 8000 Washington, DC 20530

Verizon Florida, Inc. Ms. Michelle A. Robinson c/o Mr. David Christian 106 East College Avenue, Suite 810 Tallahassee, FL 32301-7704

Wilmer Law Firm C. Ronis/D. McCuaig/J. Frankel 2445 M Street, N.W. Washington, DC 20037-1420

Attorney

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

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. 981834-TP

DOCKET NO. 990321-TP FILED: May 4, 2003

ALLTEL'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Two Edited Versions with Confidential Information Redacted

STATE OF FLORIDA

COMMISSIONERS: LILA A. JABER, CHAIRMAN J. TERRY DEASON BRAULIO L. BAEZ RUDOLPH "RUDY" BRADLEY CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK & Administrative Services BLANCA S. BAYÓ DIRECTOR (850) 413-6770 (CLERK) (850) 413-6330 (ADMIN)

Aublic Service Commission

ACKNOWLEDGMENT TO: , Division of the Commission Clerk and FROM: Administrative Services Acknowledgment of Receipt of Confidential Filing RE: This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket No. or (if filed in an undocketed matter) concerning filed on behalf of ALLTE . The document will be maintained in locked storage. Any questions regarding this matter should be directed to Kay Flynn at (850) 413-6770.

PSC/CCA019-C (Rev 01/02)

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

April 14, 2003

CONFIDENTIAL DOCUMENTS ATTACHED

BY HAND DELIVERY

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

CONFIDENTIAL

COMMISSION

Re:

Docket No. 981834-TP; CLAIM OF CONFIDENTIALITY AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION; ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT RESPONSEIVE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 1.

Dear Ms. Bayo:

Enclosed for filing on behalf of ALLTEL COMMUNICTIONS, INC. in the above docket are the original CONFIDENTIAL ANSWERS to STAFF'S FIRST SET OF INTERROGATORIES and the CONFIDENTIAL document that is responsive to Staff's First Request for Production of Documents, No. 1. In accordance with Rule 25-22.006(3)(a), Florida Administrative Code, ALLTEL Florida, Inc. hereby files notice of its intent to request confidential classification for the highlighted portions of these documents.

An original and fifteen copies of the public, non-confidential version of the Answer to Staff's First Set of Interrogatories are being filed contemporaneously under a separate cover.

Please acknowledge receipt and filling 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.

RECEIVED & FILED

Heffer Wahlen

Enclosures

cc: All parties of record (without confidential enclosure)

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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, Inc.'s service territory

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. 981834-TP

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

COMPLETE

ALLTEL COMMUNICATIONS, INC.'S CONFIDENTIAL ANSWERS 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.

2

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

- 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 months using the Straight Line Depreciation method.

CONFIDENTIAL

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
CONFIDENTIAL

- 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,
- 2. Inc. in the provision of telephone exchange service in Florida is months using the Straight
- 3 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.

7

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.

BETTYEY WILLIS

The foregoing instrument was acknowledged before me this 142 day of April, 2003, by BETTYE J. WILLIS, who is personally known to me.

OF STANDS

My Commission Expires: 9/1/11

Noney Sea Word

SANDRA JEAN WOOD

Notacy Pablic
Title Renk Social No. --

Hard Steel Steel Committee

ALLTEL Communications Services, Inc.

Co 482, CLEC - Jacksonville, FL

Depreciation Information

	Λ	A A	Effective as of March 31, 2003 🔥		£	\subseteq
	H		$\boldsymbol{\mathcal{U}}$	Sentiment of the sent of the s	f "
	Acc't	Acc't Description	Book Description	Depr Description	<u>L/M</u>	Net Sivg Value
1	14091	Co Communication Equip	General Ledger	Straight Line Depre		
•	14140	Computer & Data Equip	General Ledger	Straight Line Depre		
•	14340	Data Processing Equip	General Ledger	Straight Line Depre		
•	14435	Voice Mail	General Ledger	Straight Line Depre		
5	14345	Furniture & Fixtures	General Ledger	Straight Line Depre		
•	14280	Other Tools	General Ledger	Straight Line Depre		
	14355	Other Tools & Work Equip	General Ledger	Straight Line Depre		
	14420	MTSO/Switch	General Ledger	Straight Line Depre		•
	14460	Fiber Optic Ring	General Ledger	Straight Line Depre		
10	14560	Microwave/T-Carrier	General Ledger	Straight Line Depre		
	14335	Vehicles	General Ledger	Straight Line Depre		

1.1.

STATE OF FLORIDA

COMMISSIONERS:
LILA A. JABER, CHAIRMAN
J. TERRY DEASON
BRAULIO L. BAEZ
RUDOLPH "RUDY" BRADLEY
CHARLES M. DAVIDSON



DIVISION OF THE COMMISSION CLERK & ADMINISTRATIVE SERVICES
BLANCA S. BAYÓ
DIRECTOR
(850) 413-6770 (CLERK)
(850) 413-6330 (ADMIN)

Public Service Commission

ACKNOWLEDGMENT

PSC/CCA019-C (Rev 01/02)

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9(15 FAX (850) 222-7560

April 14, 2003

CONFIDENTIAL DOCUMENTS ATTACHED

BY HAND DELIVERY

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

CONFIDENTIAL

COMMISSION

Re: Docket No. 981834-TP; CLAIM OF CONFIDENTIALITY AND NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION; ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT RESPONSEIVE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 1.

Dear Ms. Bayo:

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An original and fifteen copies of the public, non-confidential version of the Answer to Staff's First Set of Interrogatories are being filed contemporaneously under a separate cover.

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.

RECEIVED & FILED

Vteff∞ Wahler

Enclosures

cc: All parties of record (without confidential enclosure)

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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, Inc.'s service territory

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. 981834-TP

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

CONTRACTOR

ALLTEL COMMUNICATIONS, INC.'S CONFIDENTIAL ANSWERS 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.

2

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

- 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 __months using the Straight Line Depreciation method.

CONFIDENTIAL

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

4

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
CONFIDENTIAL

- 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,
- 2. Inc. in the provision of telephone exchange service in Florida is months using the Straight
- 3 Line Depreciation Method with a net salvage value of

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ALLTEL
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INTERROGATORY NO. 5
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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
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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.

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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 conrect to the best of her information and belief.

DATED this 14 day of April, 2003.

BETTE WILLIS

The foregoing instrument was acknowledged before me this /4/2 day of April, 2003, by BETTYE J. WILLIS, who is personally known to me.

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OR OT

My Commission Expires: 9/1/11

Notary Jean Word

DANDER JEAN WOOD

Title, Rank, Serial No., etc.

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ALLTEL	Communications	Services,	Inc.

Co 482, CLEC - Jacksonville, FL **Depreciation Information**

	Λ	0 /	Effective as of Marc	h 31, 2003 _/)	5	<i>a</i>
	H	B			The Street	*
	Acc't	Acc't Description	Book Description	Depr Description	<u>L/M</u>	Net Slvg Value
1	14091	Co Communication Equip	General Ledger	Straight Line Depre		
•	14140	Computer & Data Equip	General Ledger	Straight Line Depre		
•	14340	Data Processing Equip	General Ledger	Straight Line Depre		
•	14435	Voice Mail	General Ledger	Straight Line Depre		
5	14345	Furniture & Fixtures	General Ledger	Straight Line Depre		
•	14280	Other Tools	General Ledger	Straight Line Depre		
	14355	Other Tools & Work Equip	General Ledger	Straight Line Depre		
•	14420	MTSO/Switch	General Ledger	Straight Line Depre		•
	14460	Fiber Optic Ring	General Ledger	Straight Line Depre		
LA	14560	Microwave/T-Carrier	General Ledger	Straight Line Depre		

General Ledger

Straight Line Depre

14335

Vehicles

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

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. 981834-TP

DOCKET NO. 990321-TP FILED: May 4, 2003

ALLTEL'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Line-by-line Justification

<u>Page</u>	Line(s)	Explanation
3	b	Note 1
5	2 (data) 3 (data)	Note 1 Note 1
13	5 (data) E1-11	Note 1
	F1-11	Note 1

Note 1

The highlighted information shows lives and salvage values of plant categories used by ALLTEL Communications, Inc. for internal accounting purposes. This data reflects ALLTEL's evaluation of the lives and value of its plant used in the provision of competitive services. This data can be used by competitors and potential competitors to evaluate ALLTEL's capital strategies. Information of this type is not publicly available for ALLTEL's competitors; therefore, public disclosure of the data would place the Company at a competitive disadvantage, thereby harming the Company.