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September 29, 2005

VIA 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 32399-0870

050693-TL

Re: New Docket; Alltel Florida, Inc.'s Petition to Reduce Intrastate Switched Access Rates in a Revenue Neutral Manner Pursuant to Section 364.164, Florida Statutes.

Dear Ms. Bayo:

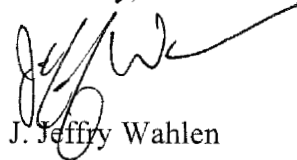
Enclosed for filing on behalf of Alltel Florida, Inc. ("Alltel") are the original and fifteen (15) copies of Alltel's First Request for Confidential Classification and Protective Order Pursuant to Section 364.183(1), Florida Statutes.

This first request covers the confidential versions of the Exhibits of Bettye J. Willis and Blessing Exhibit DCB-4 ["Confidential Exhibits"], highlighted copies of which 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.

Sincerely,



J. Jeffrey Wahlen

Enclosures

cc: Charles J. Beck, Office of Public Counsel (w/encls.)

DOCUMENT NUMBER-DATE

09286 SEP 29 05

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Alltel Florida, Inc.'s Petition)
To Reduce Intrastate Switched Network)
Access Rates In A Revenue Neutral)
Manner Pursuant to Section 364.164,)
Florida Statutes)
_____)

Docket No.: _____
Filed: September 29, 2005

**ALLTEL FLORIDA, INC.'S FIRST REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND PROTECTIVE ORDER
PURSUANT TO SECTION 364.183(1), FLORIDA STATUTES**

Alltel Florida, Inc. ("Alltel" or the "Company") hereby requests that the Florida Public Service Commission ("FPSC" or the "Commission") classify certain documents and/or records identified herein as confidential, exempt from public disclosure under Chapter 119, Florida Statutes and issue a protective order reflecting such decision and protecting the information in the possession of the Commission and the Office of the Public Counsel ("OPC" or "Public Counsel"). The information that is the subject of this request is contained in certain documents contained in Alltel's pre-filed direct testimony (Willis and Blessing) and exhibits accompanying its Petition to Reduce Intrastate Switched Network Access Rates in a Revenue Neutral Manner filed contemporaneously herewith.

1. The following documents or excerpts from documents are the subject of this request:
 - a. **Highlighted portions of Exhibit No. ___ (DCB-4) (Hatfield Cost Study)**
 - b. **Highlighted portions of Exhibit No. ___ (BJW-1 through BJW-8)**

2. One unredacted copy of these documents with the confidential information highlighted in yellow has been submitted under separate cover to the Division of Records and Reporting contemporaneously with the filing of this request. Two copies on which the information asserted to be confidential has been redacted are included with the original of this request. The original unredacted versions of the Confidential Exhibits are included in the public version of the exhibits filed with the petition and direct testimony.

3. The information for which this request is submitted is trade secret or other highly proprietary competitive or valuable information and thus meets the definition of confidential proprietary business information pursuant to Section 364.183(3), Florida Statutes. Specific justification for confidential treatment is set forth in Attachment A.

4. Section 364.183(3), Florida Statutes, states:

(3) The term "proprietary confidential business information" means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. The term includes, but is not limited to:

(a) Trade secrets.

(b) Internal auditing controls and reports of internal auditors.

(c) Security measures, systems, or procedures.

(d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.

(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.

(f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

5. Furthermore, Section 688.002(4), Florida Statutes is instructive on what constitutes a trade secret and provides that:

(4) "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process that:


(a) Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use; and

(b) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

6. The subject information to this request has not been publicly released. Furthermore, release of the information could impair the company's ability to compete for, or negotiate with, certain business customers.

WHEREFORE, based on the foregoing, Alltel respectfully requests that the Commission grant this request, exempt the information specified herein from disclosure under Chapter 119, Florida Statutes and issue a protective order, protecting the information from disclosure while it is maintained at the Commission and in the possession of the Office of the Public Counsel.

RESPECTFULLY SUBMITTED this 29th day of September, 2005.



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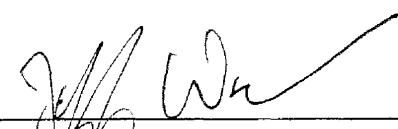
and

STEPHEN B. ROWELL
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(501) 905-8460

ATTORNEYS FOR
ALLTEL FLORIDA, INC.

Certificate of Service

I hereby certify that a true and correct of the foregoing (without the two redacted copies specified in paragraph 2) were served by hand delivery on this 29th day of September to Harold McLean, Public Counsel, and Charles J. Beck, Deputy Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400.



Attorney

ATTACHMENT A

Document and Page and Line Numbers	Justification for Confidential Treatment
Highlighted portions of Exhibit BJW-6: units 0904 thru 0805, current intrastate revenue and new intrastate revenue, for all lines.	Reflects Alltel's access revenue minutes/units and dollars by type of access service, which services are competitive services. Disclosure of this information will harm Alltel's competitive business interests. Both minutes and revenues reflect the size of Alltel's market share, which information about Alltel's competitors is not available to Alltel, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Highlighted portions of Exhibit BJW-8, page 2: August 2005 units, revenue/month and revenue increase/year for current period and years 1, 2 and 3, for each row, i.e., all exchanges	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for R1 service. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Highlighted portions of Exhibit BJW-8, page 3: August 2005 units, revenue/month and revenue increase/year for current period and years 1, 2 and 3, for each row, i.e., all exchanges	Reflects Alltel's access lines/units by exchange for each of Alltel's exchanges and the revenues generated per exchange for B1 service. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Highlighted portions of Exhibit BJW-8, page 3: quantities and revenues for	Reflects Alltel's NRC units by service (service orders, premise visits and central office work), as well as revenues generated for such services. This data reflects market share information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar info about

current period, and years 1, 2 and 3, plus revenue changes, for business and residential non-recurring charges (all lines)	Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4, page 1, columns, for lines, UNE loops, monthly cost line, residential line, and business line for all wire center lines	Reflects Alltel's HAI costs by wire center for each of Alltel's wire centers in Florida. This data reflects competitive cost information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4, pages 2-27, all columns, for all wire center lines	Reflects Alltel's HAI inputs (lines, investments by types, costs, expenses, network units, billing units) by wire center for each of Alltel's wire centers in Florida. This data reflects competitive information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4, pages 28-42, all columns, for only line	Reflects Alltel's HAI data (lines, investments by types, costs, expenses, network units, billing units). This data reflects competitive information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4, pages 43-45, columns with dollar amounts	Reflects Alltel's HAI data for loops costs. This data reflects competitive information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4, page 46, columns 1, 4, 7, 10	Reflects Alltel's HAI data for CCC Factors. This data reflects competitive information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)
Exhibit DCB-4,	Reflects Alltel's HAI data for cost of debt and equity. This data

<p>page 54, user input and calculation columns for cost of debt, debt fraction, cost of equity, equity fraction, weighted equity fraction and overall cost of capital lines.</p>	<p>reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, page 55, tax rate, overhead factor and other taxes factors</p>	<p>Reflects Alltel's HAI data for effective tax rate, corporate overheads and other tax rates. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, page 58, columns for economic lives, net salvage and adjusted projection lives, for each line of plant category</p>	<p>Reflects Alltel's HAI data for lives, salvage values and projected lives for depreciation purposes. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, page 68, line 710 (col 3) and line 7240 (cols 2, 3)</p>	<p>Reflects Alltel's HAI data for operating expense factors and revenues and same for operating other taxes. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, page 74, scenario value column for all expense and switching lines</p>	<p>Reflects Alltel's HAI data for different factors and categories. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, page 80, current scenario value column for cost of</p>	<p>Reflects Alltel's HAI data for cost of debt, debt fraction, cost of equity, corporate overhead factor and other taxes factor. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's</p>

<p>debt, debt fraction, cost of equity, corporate overhead factor and other taxes factor</p>	<p>competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>
<p>Exhibit DCB-4, pages 81-82, current scenario value column for lines from motor vehicle through operator systems and from digital circuit equipment to conduit systems</p>	<p>Reflects Alltel's HAI data for expense/investment categories. This data reflects competitive financial information for services subject to competition. Disclosure of this information will harm Alltel's competitive business interests, because similar information about Alltel's competitors is not available, resulting in a competitive disadvantage to Alltel if its data is disclosed. (s. 364.183(3) (e), F.S.)</p>