

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

October 11, 2005

BY 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. 050693-TL

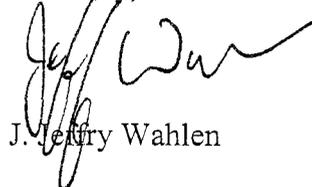
Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of Alltel's Objections to Citizens' First Set of Interrogatories.

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

Enclosure

cc: Parties of Record

DOCUMENT NUMBER-DATE

09740 OCT 11 '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)	Docket No.: 050693-TL
Manner Pursuant to Section 364.164,)	Filed: 10.11.05
Florida Statutes)	
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**ALLTEL'S OBJECTIONS TO
CITIZENS' FIRST SET OF INTERROGATORIES**

Alltel-Florida, Inc. ("Alltel"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.280 and 1.340, Florida Rules of Civil Procedure, hereby files the following Objections to the Citizens of Florida's ("Citizens") First Set of Interrogatories (Nos. 1-4), dated October 4, 2005 ("First IRR"). The objections stated herein are preliminary in nature and are made at this time to comply with the five business day requirement set forth in Order No. PSC-05-0959-PCO-TL, issued October 7, 2005. Should additional grounds for objection be discovered as Alltel prepares its answers to the First IRR, Alltel reserves the right to supplement, revise, or modify its objections at the time it serves its answers.

GENERAL OBJECTIONS

Alltel makes the following general objections to Citizens' First IRR. These general objections apply to each of the individual interrogatories, respectively, and will be incorporated by reference into Alltel's answers when they are served on Citizens.

1. Alltel objects to each interrogatory in the First IRR to the extent that such request seeks documents which are beyond the scope of discovery permitted in this proceeding as set forth at Section 364.164, subsections (3) and (4), Florida Statutes, or

seeks documents which are beyond the scope of those issues the Legislature has determined are to be considered by the Commission in this proceeding, or seeks answers containing information that is beyond matters contained in Alltel's testimony and exhibits addressing those same issues.

2. Alltel objects to the First IRR to the extent the individual interrogatories therein seek to impose an obligation on Alltel to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatories are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules.

3. Alltel objects to the First IRR to the extent that the individual interrogatories therein are intended to apply to matters other than Alltel's intrastate operations in the State of Florida subject to the jurisdiction of the Commission, in which case Alltel objects to such interrogatory as being irrelevant, overly broad, unduly burdensome, and oppressive.

4. Alltel objects to each and every interrogatory in the First IRR and related instructions to the extent such interrogatory calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

5. Alltel objects to each and every interrogatory in the First IRR insofar as the interrogatory is vague, ambiguous, overly broad, imprecise, or utilize terms that are subject to multiple interpretations but are not properly defined or explained for purposes of the request. Any answers provided by Alltel in response to the First IRR will be provided subject to, and without waiving, the foregoing objection.

6. Alltel objects to each and every interrogatory in the First IRR insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. Alltel will attempt to note in its responses each instance where this objection applies.

7. Alltel objects to providing information to the extent that such information is already in the public record before the Commission.

8. Alltel objects to the First IRR and the instructions and definitions therein insofar as they seek to impose obligations on Alltel that exceed the requirements of the Florida Rules of Civil Procedure or Florida Law.

9. Alltel objects to each and every interrogatory in the First IRR insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming.

10. Alltel objects to each and every interrogatory in the First IRR to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes. To the extent that the Office of Public Counsel has requested proprietary confidential business information which is not subject to the "trade secrets" privilege, Alltel will make such information available in accordance with the Protective Order sought by Alltel in this docket, subject to any other general or specific objections contained herein.

11. Subject to its general and specific objections, Alltel will serve answers to the First IRR on October 19, 2005, the date agreed upon by Alltel and the Office of Public Counsel.

SPECIFIC OBJECTIONS

In addition to the foregoing general objections, Alltel raises the following specific objections to the following individual interrogatories. As noted previously, should additional grounds for objections be discovered as Alltel prepares its answers to the above-referenced interrogatories, Alltel reserves the right to supplement, revise or modify its objections at the time it serves its answers.

4. **Please provide the percent of all households subscribing to basic local telephone service in Alltel Florida's region during each year 2002 through 2005.**

OBJECTION: In addition to its general objections, which are incorporated herein by reference, ALLTEL objects to this interrogatory on grounds that answering this question with precision as posed would be burdensome. Alltel does not track the number of households in its service territory in the normal course of business, so the information necessary to answer this question with precision is not readily available in the business records of Alltel. Moreover, as discussed in the direct testimony of Bettye J. Willis, Alltel provides local exchange telecommunications services to all *or parts* of thirteen (13) counties in North Central Florida, so finding data specifying the number of households in Alltel's service territory from governmental sources known to Alltel is not possible. Without waiving these objections, Alltel will use data from governmental sources known to Alltel and Alltel's business data regarding access lines to estimate an answer to this question and in its answer will note the sources of information used and any assumptions used in preparing the estimate.

DATED this 11th day of October, 2005.



J. JEFFERY WAHLEN
Fla. Bar No. 884316
Ausley & McMullen
P. O. Box 391
Tallahassee, Florida 32302
850.425.5471 (direct)

and

STEPHEN B. ROWELL
Alltel Communications
One Allied Drive, B5F11
Little Rock, AR 72203-2177
(501) 905-8460

ATTORNEYS FOR
ALLTEL FLORIDA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of the foregoing was served by hand delivery and electronic mail this 11th day of October, 2005, to the following:

Beth Keating and Jason Rojas
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Harold McLean, Public Counsel
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