

REDACTED



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**James L. White, Jr.**  
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May 5, 2006

Ms. Blanca Bayo, Director  
The Commission Clerk and Administrative Services  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

**Re: Docket No. 060158-TL**

Dear Ms. Bayo:

In response to Order No. PSC-06-0258-PAA-TL in Docket No. 060158-TL, *Investigation of Protection of Customer Proprietary Network Information by Incumbent Local Exchange Companies*, Alltel Florida, Inc. ("Alltel")<sup>1</sup> provides the following information regarding its current security measures for subscriber account information, which includes customer proprietary network information ("CPNI").

Overview of Alltel Policies and Procedures

It is Alltel's policy to protect all of our customers' private information, including Customer Proprietary Network Information ("CPNI"), consistent with the requirements of applicable State and Federal laws and regulations. Alltel's documented policies and procedures, including Alltel's *Enterprise Information Security Policy Framework, Information Classification Policies* and *Working with Integrity Policy*, are intended, among other things, to protect consumers from unauthorized disclosure of their data. See also Alltel's Privacy Statement on [www.alltel.com](http://www.alltel.com).

The *Information Security Policy Framework* document details the interrelationships between a wide range of Alltel information security policies and procedures, and articulates

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<sup>1</sup> Alltel Florida, Inc. is a subsidiary of Alltel Corporation, a holding company of various subsidiaries and affiliates providing telecommunications services including local exchange service interexchange service, and commercial mobile radio services. Alltel Corporation recently announced the spin off and merger of its local exchange and interexchange business with those of another company. Subsequent to that transaction, Alltel Florida will be part of the new company formed by the spin off and merger. It is the new company's present intent to continue to enforce the privacy and security policies adopted by Alltel that relate to CPNI protections after the spin-off and merger are completed.

PROPRIETARY AND CONFIDENTIAL

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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management's intentions with respect to the application and scope of the underlying policies. The *Information Classification Policy* document establishes certain sensitivity classifications for customer information, and details a number of policies and procedures for the handling, storage, transport and disposal/destruction of such information. The *Working with Integrity Policy* applies to all company personnel and is intended to ensure that the strictest ethical standards are followed in the handling and maintenance of customer data, as well as in all other aspects of their employment. These policies include specific requirements for the handling of customer data.

Alltel has also formed an Enterprise Security Office and Departmental Information Security Teams for purposes of coordinating and implementing security policies, developing new security procedures, providing information security advice to managers, reviewing and monitoring data for compliance, and for giving general security related recommendations company-wide. Collectively, these policies, procedures and initiatives are intended to establish and maintain a secure environment for customer data, and deter data theft.

#### Policy and Rules Regarding the Release of Subscriber Account Information

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Conclusion

Alltel appreciates the opportunity to work hand-in-hand with the Commission to protect our customers from fraudulent activities. Alltel encourages the Commission to continue to address unauthorized access to CPNI by working with other agencies to police those who would attempt to illegally obtain the data, rather than impose additional security measures that may frustrate legitimate account inquires from customers, extend customer service call times, and create congestion at call centers, thereby elevating carriers' and ultimately the subscribers' costs.

Sincerely,

A handwritten signature in cursive script that reads "James White". The signature is written in black ink and is positioned above the typed name and title.

James White  
Regional Vice President-External Affairs

cc: Rick Moses, FPSC  
Bettye Willis, Alltel  
Whitney Bell, Alltel