

Kansas City MO 64112



Sprint Personal Communication Service

January 30, 1998

Via Federal Express

Blanca Bayo Division of Records and Reporting State of Florida Public Service Commission Capitol Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 (850) 413-6770

980000-PU

Re:

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION REQUESTED BY THE PUBLIC SERVICE COMMISSION STAFF ON DECEMBER 10, 1997

Dear Ms. Bayo:

CMU ____

CTR ____

EAG

LEG ____

LIN

OFC

RC -

SEC

The Public Service Commission Staff made the attached December 10, 1997 inquiry of Sprint PCS concerning utilization of numbers assigned to Sprint PCS. The information requested by the Staff is intended to be and is treated by Sprint PCS as private and confidential and has not been disclosed.

	proceeding, but rather is made in anticipation of potentially opening a formal proceeding. The December 10, 1997 request for information is, therefore, an inquiry by the Public
ACK	Service Commission and Staff. Florida Statute 350.121 provides that information
MM	submitted pursuant to Commission inquiry is considered confidential and exempt from
APP	Florida Statute 119.07(1) while the inquiry is pending:
CAF	

If the commission undertakes an inquiry, any records, documents, papers, maps, books, tapes, photographs, files, sound recordings, or other business material, regardless of form or characteristics, obtained by the commission incident to the inquiry are considered confidential and exempt from s. 119.07(1), while the inquiry is pending. If at the conclusion of an inquiry the commission undertakes a formal proceeding, any matter determined by the commission or by a judicial or administrative body, federal or state, to be trade secrets or proprietary confidential

This document has been placed in confidential storage pending advice from OPR staff on further handling.

DOCUMENT NUMBER-DATE

01640 FEB-28

business information coming into its possession pursuant to such inquiry shall be considered confidential and exempt from s. 119.07(1). Such material may be used in any administrative or judicial proceeding so long as the confidential or proprietary nature of the material is maintained.

Similarly, the Practice and Procedures before the Florida Public Service Commission, §25-22.006(2)(a) provides that "All material obtained incident to an inquiry by the Commission, its staff, or any consultant employed by the Commission is exempt from the public access requirements of Section 119.07(1), F.S., and will be accorded stringent procedural safeguards against public disclosure during the pendency of the inquiry" Section 25-22-006(2)(b) provides that a notice of termination of inquiry "will indicate whether the Commission intends to retain, destroy, or return the materials listed. A source may, within 30 days after issuance of the notice, file with the Division of Records and Reporting a written request that the material the Commission intends to retain be classified as confidential and exempt from Section 119.07(1), F.S."

The December 10, 1997 request for information is an "inquiry" within the meaning of Florida Statute 350.121 and §25-22.006(2)(a) of the Practice and Procedures before the Florida Public Service Commission, and the procedures stated in §§25-22.006(2)(a) & (b) apply. Under Florida Statute 350.121 and the §§25-22.006(2)(a) & (b) procedures, the information submitted by Sprint PCS in response to the December 10, 1997 inquiry is automatically treated as confidential and exempt from disclosure under Florida Statute §119.07(1) while the inquiry is pending, and Sprint PCS is not required to submit a Request for Confidential Classification unless the Commission, after the issuance of a notice to terminate the inquiry, notifies Sprint PCS of its intention to retain the information submitted pursuant to inquiry.

Having said all that, however, because the information submitted in response to the December 10, 1997 inquiry is highly confidential and commercially sensitive, Sprint PCS, out of an abundance of caution, formally requests at this time confidential classification of the information submitted in response to the December 10, 1997 while the inquiry is pending and in the event that the Commission or Staff retains the confidential information after the inquiry is terminated.

The December 10, 1997 inquiry contains eight different requests: A through H. Sprint PCS requests confidential classification of information submitted in response to the following six December 10, 1997 requests: B (parts 1, 2, & 3), C, D, E, F (parts 1, 2, & 3), and G.

In addition to a copy of the Staff's December 10, 1997 inquiry, Sprint PCS submits to the Division of Records and Reporting one diskette (the format requested by the Staff) containing Sprint PCS's confidential responses to requests B (parts 1, 2, & 3), C, & F (parts 1, 2, & 3). Responses to A, D, E, G, & H are submitted to the Division

of Records and Reporting in letter form, which is also attached to this Request for Confidential Classification. Pursuant to Commission Practice and Procedure, a copy of the diskette is <u>not</u> being sent to the Staff. As for the letter with the remaining responses to Staff's inquiry, confidential responses D, E, & G have been redacted, and the redacted letter sent to the Staff.

The information sought by Staff's December 10, 1997 inquiry is "proprietary confidential business information" within the meaning of Florida Statutes 364.183. Staff requests, for example, Sprint PCS' current and forecasted number utilization (a 2 and 6 year forecast), forecast methods, practices on aging of disconnected customers, numbers available for assignment and an explanation of why numbers may not be available for assignment. The information requested by Staff's December 10, 1997 inquiry is intended to be and is treated by Sprint PCS as private in that the disclosure of the information would cause harm to the company's business operations, and has not been disclosed. The requested information includes information relating to competitive interests, the disclosure of which would impair the competitive business of Sprint PCS. The information requested by Staff effectively seeks information about Sprint PCS' competitive business plan for the next six years. Sprint PCS is a new market entrant, and the requested information for which Sprint PCS seeks confidential classification could be used, for example, to help discern markets Sprint PCS intends to target in the future and where it expects consumer demand and growth. Number utilization, forecast, and assignment information of individual companies is treated by the telecommunications industry as private and confidential, see for example, the Industry Numbering Committee Central Office Code Assignment Guidelines.

If you have any questions, please call me.

Very truly yours,

Scott Ludwikowski

Network Engineer Telephone Number Administration

Sprint PCS 816-559-1649

CC: Commission Staff (Stan Greer), w/ copy of December 10 inquiry, w/o diskette

w/ redacted letter

STATE OF FLORIDA

COMMISSIONERS:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
JOE GARCIA
DIANE K. KIESLING



DIVISION OF COMMUNICATIONS RICHARD N. TUDOR ASSISTANT DIRECTOR (904) 413-6516 (V) (904) 413-6517 (F) RTUDOR@PSC.STATE.FL.US

Public Service Commission

December 10, 1997

Ms. Diane Little Sprint PCS 4900 Main Street Kansas City, MO 64112

Dear Ms. Little:

As you are well aware, since May 1995 the telecommunications industry in Florida has been in a continuous process of implementing area codes in Florida. During that time, the industry has implemented five new area codes in Florida, bringing the total number of area codes in Florida to nine (9). In discussions with the numbering administrators about future exhausts of Florida area codes, it is apparent that this trend does not appear to be slowing down. Therefore, the Florida Public Service Commission is undertaking a major utilization study of all area codes in Florida in an attempt to determine whether numbering resources are being used in an efficient manner. In addition, the Commission intends to review other aspects such as number pooling and rate center consolidation to determine if these approaches could extend the life of area codes throughout Florida.

In an attempt to make the data collection process easier for your company, staff has provided a formatted disk to assist your company in responding to several questions listed below. In addition to providing the formatted files, staff has provided a description that explains exactly what information staff wants your company to provide for each column listed on each form and on the diskette. (See Attachment 1).

Therefore, staff would appreciate it if your company could respond to all questions listed below by January 31, 1998. If there is a location on a form provided on the diskette for your company to report the data, staff will identify the form name and column that you should populate with your company's data.

RATE CENTER CONSOLIDATION

A. The Florida Public Service Commission is reviewing the possibility of consolidating rate centers within a given NPA in order to better utilize the telephone numbers within the specific NPA.

- Please identify any rate center consolidation proposal for any NPA in Florida that your company believes would allow the telecommunications industry to better utilize
- the telephone numbers assigned within a given NPA. Listed on Attachment 1 Form RC1000.WK4 are the rate centers identified by LATA.
- For each rate center consolidation proposal identified in A(1) above, please provide
 the Commission with the advantages and disadvantages of the proposal. Separately
 identify any advantages and disadvantages specifically associated with customers
 and telecommunications carriers.
- B. For each rate center listed on Attachment 1 Form RC1000.WK4, identify the following information listed below. Please use the spreadsheet identified as RC1000.WK4 on the disk provided. Attachment 1 provides an explanation on how staff wants your company to complete the form.
 - Identify the number of NXXs assigned to your company for each rate center. (RC1000.WK4 - Column D)
 - Provide the number of 1000 number blocks for each rate center that have no numbers assigned. (Form RC1000.WK4 - Column E)
 - Provide the number of 100 number blocks for each rate center that have less than 10 numbers assigned. (Form RC1000.WK4 - Column F)
- C. For each rate center listed on Attachment 1 Form RCFORCST.WK4, provide the projected number of NXXs in use by rate center for the next 2 years per quarter and the next 6 years per year. Please use the spreadsheet identified as RCFORCST.WK4 on the disk provided. Attachment 1 provides an explanation on how staff wants your company to complete the form.
- D. Explain how your company developed the forecast used to complete RCFORCST.WK4.

AREA CODE/NXX DATA

- E. Provide your company's practices on aging of disconnected customers. Explain how your company tracks when the aging period is over and the telephone number is once again available for reuse. Identify any differences between class of customers such as residential or business.
- F. For each 100 number block assigned to your company, identify the following information listed below. Please use the spreadsheet identified as NPA100.WK4. Attachment 1 provides an explanation on how staff wants your company to complete the form.
 - List each 100 number block (NPA NXX-XX) assigned to your company. (NPA 100.WK4 - Column A, B, and C)
 - For each 100 number block listed in F(1) above, provide the total telephone numbers assigned. (NPA100.WK4 - Column D)
 - For each 100 number block listed in F(1) above, provide the total telephone

numbers that are being aged. (NPA100.WK4 - Column E)

G. For each area code (305, 352, 407, 561, 813, 850, 904, 941, 954) in which your company has been assigned telephone numbers, explain all reasons why telephone numbers within an NXX assigned to your company are not available for assignment in the provision of telecommunications services. For each reason, identify the number of telephone numbers your company has not assigned by area code.

NUMBER POOLING

H. Provide any possible number pooling mechanisms that your company is aware of that may be usful in determining a more efficient method of assigning telephone numbers in Florida. Identify the pros and cons of the number pooling proposals provided.

If you have any questions, please call Stan L. Greer at (850) 413-6562.

Sincerely,

Walter D'Haeseleer

Director

ATTACHMENT 1

- - Please submit your data in electronic form on the 3.5 disk provided in a Lotus 1-2-3 Release 5 or comparable version file. (All files on the disk are in Lotus 1-2-3 Release 5 format)
- If the format of the electronic form is not Lotus 1-2-3 Release 5, please specify the format used.
- If you use a different electronic form, please use the same format as listed in Attachment
 l and on the diskette provided.
- Please type your company name on each page in the location : lentified.
- So that staff may aggregate the data do not use formulas to input the data.

1900 NUMBER BLOCKS AVAILABILITY BY RATE CENTER

COMPANY NAME: COMPANY CONTACT NAME:

NAME (A)	LATA (B)	CODE	ASSIGNED	NUMBER OF UNASSIGNED 1000 NUMBER BLOCKS	LESS THAN
Alachua	Jacksonville	904	(0)	(E)	(F)
Afford	Panama City				
Aligator Point	Panama City	850			
Aztha	Panema City	850			
Apalacticola	Panama City	650			
	Penema City	650			
Apopka	Ortando	407			
Arcadia	Ft Myers	941			
Baker	Prinsacola	650			
Bakhwin	Jacksonville	904			
Bartow	Tampa	941			
Belle Glade	Southeast	561			
Bethiew	Gainesville	352			
Severty Hills	Gamesville	352		-1	
lig Pine					
Rountstown	Southeast	561			
	Pariama City	850		1	
oca Grande	Ft. Myers	941			
oca Raton	Southeast	561		1	
onitay	Panama City	850			
onita Springs	Ft. Myers	941		,	
owting Green	Ft Myers	641			
oynton Beach	Southeast	561			
radenton	Tampa	941			
ranford	larker (7)			,	
ristol	Jacksonville	904			
Address of the Control of the Contro	Panama City	650			
nonson	Gainesville	352		1	
rooker	Gainesville	352		****	
rookswile	Gamesville	352			
unneil .	Daytona Beach	904			
ushned	Gaineavilla	352	,		
nedahan	Jacksonville	904			
antonment	Pensacola	850			
spe Coral	Ft Myers	941			
ape Haze	FL Myers			1	
errabelle	- C Notes	941			
edar Keys	Panama City	850			
elebration	Gainesville	352			
	Orlando	407			
moury	Mobile, Alabama	850			
latta/loochee	Panama City	850			
erry Lake	Tatlahasses	850			
refland	Gainesville	352			
ripley	Panama City	850			
78	Gainesville	352			
earwater	Tampa	813			
ermont	Gainesville	Property and address of the last of the la			
rwiston .		252			
CDA	Fl, Myers	941			
coe Beach	Ortando	407			
	Orlando	407			
ral Springs	Southeast	954			
flondale	Panama City	850			
rwiordville .	Tallahassee	650			
recent City	Gainesville	252			
Striew	Pensacola	850			
es City	Gainesville	24.5			
stal River	Geinesville	352			
te City	Gainesville				
riona Beach		352			
Funiak Springs	Daytona Beach	904			
	Pensacola	850			
Land	Daytona (leach	904			
Leon Springs	Daytona Beach	904			
lary	Ortando	407			
rfield Beach	Southeast	954			
by Beach	Southeast	561			
on .	Pensacola	850			
ring Park	Jacksonville :	904			
neton	Gainesvile				
Orange		352			
Point	Orlando	407			
	Panama City	850			
Galle	Orlando	407			
Air Force Base	Pensacola	650	-		
iewood	Tampa	941 1			
99	Gaineaville	252			
rgiades	Ft. Myers	941			
rendine Beach	Jacksonnile	904			

1900 NUMBER BLOCKS AVAILABILITY BY RATE CENTER

COMPANY NAME: COMPANY CONTACT NAME:

NAME (A)	CENTERS LATA (B)	CODE	ASSIGNED	NUMBER OF UNASSIGNED 1000 NUMBER BLOCKS	LESS THAN 10 NUMBERS ASSIGNED
Lehigh Acres	Ft. Myers	941	10)	(£)	(F)
Live Oak	Jacksonville	904			
Luraville	Jacksonville	904			
Lynn Haven	Panama City	650			
Maccienny	Jacksonville				
Madison	ARCASOTYTING	904			
Service Control of the Control of th	Tallahassee	850			
Malone	Panama City	850			
Marathon	Southeast	305			
Marco Island	Ft. Myers	941			
Mananna	Panama City	f 650 ·			
Marville	Jacksonville	904			
Mayo	Jacksonville	904			
Mointosh	Gainesville	352			
Melbourne	Orlando				
Metrose		407			
Alamy	Gainesville	352 1			
Marry	Southeast	. 305			
dicanopy	Gainesville	1 352			
Addieburg	Jacksonville	904		1	
Aitton	Pensacola	650			
Agling	Pensacola	850 :			
Aontcello	Yaliahassaa	850			
Aontverde	Orlando	407			
Appre Haven	Ft Myers	1 641		1	
Yount Dora	Gainesville			1	
Autherry		352	THE RESERVE OF THE PARTY OF THE		
	Tampa	941		1	
unson	Pensacola	650			
yeaks.	Tampa	941		1	
apies	Ft Myers	. 941			
ew Port Richey	Tampa	613			
ew Smyrma Beach	Daytona Beach	1 904			
ewberry	Gainesville	352		1	
orth Cape Coral	Ft. Myers				
orth Dade		941			
orth Fort Myers	Southeast	. 305			
oran Fort Myers	Ft Myers	941			
orth Key Largo	Southeast	305			
orth Napies	Ft. Adyers	941			
orth Port	Tampa	941			
AN PHILE	Daytona Beach	904			
C2/4	Gainesville	- 352			
reechobee	Ft Myers	941			
dawaha .	Gainesville	352			
d Yown	Gainesville	352			
ange City					
	Daytona Beach	904			
ange Park	Jacksonville	904			
ange Springs	Gainesville	352			
lando	Orlando	407			
redo	Orlando	407			
CIE	Pensacola	850 /			
hokee	Southeast	561			
404	Jacksonville	904			
im Coast	Daytona Beach	904			
Webs	Tamos				
nacea	Tampa	941			
	Tallahasses	650			
nama City	Panama City	650 .			
sama City Beach	Panema City	850			
non	Pensacola	850			
15400/4	Pensecola	850			
Tine	Southeast	305			
ry	Talishassee	850			
non	Daytona Beach	904			
e Island	FL Myers	941			
nt City					
City	Tampa	613			
	Tampa	941 .			
nona Park	Jacksonville	904			
npeno Beach	Southeast	954			
oe de Leon	Pensacola	650			
te Verda Beach	Jacksonville	904			
Charlotte	Ft Myers	641 .			
St Joe	Panama City	650			
St Lucie	Southeast	and the same of th			
ta Gorda	Ft. Myera	561			
		941			-
WEY .	Panamis City	850			

FORM RCFORCST.WK4

INSTRUCTIONS FOR COMPLETION OF NXX FORECAST BY RATE CENTER

- Column D Provide your company's projected forecast of NXXs for 4th quarter of 1997 for each rate center identified in Column A.
- Column E Provide your company's projected forecast of NXXs for 1st quarter of 1998 for each rate center identified in Column A.
- Column F Provide your company's projected forecast of NXXs for 2nd quarter of 1998 for each rate center identified in Column A.
- Column F Provide your company's projected forecast of NXXs for 3rd quarter of 1998 for each rate center identified in Column A.
- Column G Provide your company's projected forecast of NXXs for 4th quarter of 1998 for each rate center identified in Column A.
- Column H Provide your company's projected forecast of NXXs for 1999 for each rate center identified in Column A.
- Column 1 Provide your company's projected forecast of NXXs for 2000 for each
 rate center identified in Column A.
- Column J Provide your company's projected forecast of NXXs for 2001 for each rate center identified in Column A.
- Column K Provide your company's projected forecast of NXXs for 2002 for each rate center identified in Column A.
- Column L Provide your company's projected forecast of NXXs for 2003 for each rate center identified in Column A.
- Column M Provide your company's projected forecast of NXXs for 2004 for each rate center identified in Column A.

RCFORC\$T.WK4

COMPANY NAME: COMPANY CONTACT NAME:

NAX FORECAST BY RATE CENTER

Company Comp	Company Comp	KAME (A)	WIX (6)		Code	4TH GOJ	t\$T Q	2ND Q 38D Q	180 a	4740	YEAR THE	VEAR 1866 VEAR 2000 VEAR 2001	YEAR 2001	YEAR 1002	YEAR 2002 YEAR 2005 YEAR 2004	YEAR 300
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