

 **Sprint**
Sprint PCS™
Sprint Personal Communication Service

4900 Main, Fourth Floor
Kansas City MO 64112

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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:

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.

Staff's request is not made under an open, formal Public Service Commission 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 Service Commission and Staff. Florida Statute 350.121 provides that information submitted pursuant to Commission inquiry is considered confidential and exempt from Florida Statute 119.07(1) while the inquiry is pending:

ACK _____
AFA _____
APP _____
CAF _____
CMU _____
CTR _____
EAG _____
LEG _____
LIN _____
OPC _____
RCH _____
SEC _____

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

FPSC-RECORDS/REPORTING

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 not 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
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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.

1. 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.
 2. 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.
1. Identify the number of NXXs assigned to your company for each rate center. (RC1000.WK4 - Column D)
 2. Provide the number of 1000 number blocks for each rate center that have no numbers assigned. (Form RC1000.WK4 - Column E)
 3. 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.
1. List each 100 number block (NPA NXX-XX) assigned to your company. (NPA 100.WK4 - Column A, B, and C)
 2. For each 100 number block listed in F(1) above, provide the total telephone numbers assigned. (NPA100.WK4 - Column D)
 3. 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 useful 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

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)
2. If the format of the electronic form is not Lotus 1-2-3 Release 5, please specify the format used.
3. If you use a different electronic form, please use the same format as listed in Attachment 1 and on the diskette provided.
4. Please type your company name on each page in the location identified.
5. So that staff may aggregate the data do not use formulas to input the data.

COMPANY NAME:
COMPANY CONTACT NAME:

RATE CENTERS		AREA CODE (C)	TOTAL XXXS ASSIGNED (D)	NUMBER OF UNASSIGNED 1000 NUMBER BLOCKS (E)	LESS THAN 10 NUMBERS ASSIGNED (F)
NAME (A)	LATA (B)				
Alachua	Jacksonville	904			
Aford	Panama City	850			
Alligator Point	Panama City	850			
Azha	Panama City	850			
Apalachicola	Panama City	850			
Apopka	Orlando	407			
Arcadia	Fl Myers	941			
Baker	Pensacola	850			
Baldwin	Jacksonville	904			
Bartow	Tampa	941			
Bella Glade	Southeast	561			
Belview	Gainesville	352			
Beverly Hills	Gainesville	352			
Big Pine	Southeast	561			
Blountstown	Panama City	850			
Boca Grande	Fl Myers	941			
Boca Raton	Southeast	561			
Bonifay	Panama City	850			
Bonita Springs	Fl Myers	941			
Bowling Green	Fl Myers	941			
Boynton Beach	Southeast	561			
Bradenton	Tampa	941			
Branford	Jacksonville	904			
Bristol	Panama City	850			
Bronson	Gainesville	352			
Brooker	Gainesville	352			
Brooksville	Gainesville	352			
Bunnell	Daytona Beach	904			
Bushnell	Gainesville	352			
Calahan	Jacksonville	904			
Cantonment	Pensacola	850			
Cape Coral	Fl Myers	941			
Cape Haze	Fl Myers	941			
Carrabelle	Panama City	850			
Cedar Keys	Gainesville	352			
Celebration	Orlando	407			
Century	Mobile, Alabama	850			
Chattahoochee	Panama City	850			
Cherry Lake	Tallahassee	850			
Chiefland	Gainesville	352			
Chipley	Panama City	850			
Citra	Gainesville	352			
Clearwater	Tampa	813			
Clermont	Gainesville	352			
Clewiston	Fl Myers	941			
Cocoa	Orlando	407			
Cocoa Beach	Orlando	407			
Coral Springs	Southeast	954			
Cottondale	Panama City	850			
Crawfordville	Tallahassee	850			
Crescent City	Gainesville	352			
Crestview	Pensacola	850			
Cross City	Gainesville	352			
Crystal River	Gainesville	352			
Dade City	Gainesville	352			
Daytona Beach	Daytona Beach	904			
De Funak Springs	Pensacola	850			
De Land	Daytona Beach	904			
De Leon Springs	Daytona Beach	904			
DeBary	Orlando	407			
Deerfield Beach	Southeast	954			
Delray Beach	Southeast	561			
Destin	Pensacola	850			
Dowling Park	Jacksonville	904			
Dunnellon	Gainesville	352			
East Orange	Orlando	407			
East Point	Panama City	850			
Eau Gallie	Orlando	407			
Eglin Air Force Base	Pensacola	850			
Englewood	Tampa	941			
Eustis	Gainesville	352			
Everglades	Fl Myers	941			
Fernandina Beach	Jacksonville	904			

COMPANY NAME:

COMPANY CONTACT NAME:

RATE CENTERS		AREA CODE (C)	TOTAL NXXS ASSIGNED (D)	NUMBER OF UNASSIGNED 1000 NUMBER BLOCKS (E)	LESS THAN 10 NUMBERS ASSIGNED (F)
NAME (A)	LATA (B)				
Lehigh Acres	Ft. Myers	941			
Live Oak	Jacksonville	904			
Lureville	Jacksonville	904			
Lynn Haven	Panama City	850			
Maccleenny	Jacksonville	904			
Madison	Tallahassee	850			
Malone	Panama City	850			
Marathon	Southeast	305			
Marco Island	Ft. Myers	941			
Marianna	Panama City	850			
Maxville	Jacksonville	904			
Mayo	Jacksonville	904			
McIntosh	Gainesville	352			
Melbourne	Orlando	407			
Melrose	Gainesville	352			
Miami	Southeast	305			
Micanopy	Gainesville	352			
Middleburg	Jacksonville	904			
Milton	Pensacola	850			
Molino	Pensacola	850			
Monticello	Tallahassee	850			
Montverde	Orlando	407			
Moore Haven	Ft. Myers	941			
Mount Dora	Gainesville	352			
Mulberry	Tampa	941			
Munson	Pensacola	850			
Myakka	Tampa	941			
Naples	Ft. Myers	941			
New Port Richey	Tampa	813			
New Smyrna Beach	Daytona Beach	904			
Newberry	Gainesville	352			
North Cape Coral	Ft. Myers	941			
North Dade	Southeast	305			
North Fort Myers	Ft. Myers	941			
North Key Largo	Southeast	305			
North Naples	Ft. Myers	941			
North Port	Tampa	941			
Oak Hill	Daytona Beach	904			
Ocala	Gainesville	352			
Okeechobee	Ft. Myers	941			
Oklawaha	Gainesville	352			
Old Town	Gainesville	352			
Orange City	Daytona Beach	904			
Orange Park	Jacksonville	904			
Orange Springs	Gainesville	352			
Orlando	Orlando	407			
Oviedo	Orlando	407			
Pace	Pensacola	850			
Pahokee	Southeast	561			
Palatka	Jacksonville	904			
Palm Coast	Daytona Beach	904			
Palmetto	Tampa	941			
Panacea	Tallahassee	850			
Panama City	Panama City	850			
Panama City Beach	Panama City	850			
Paxton	Pensacola	850			
Pensacola	Pensacola	850			
Pemine	Southeast	305			
Perry	Tallahassee	850			
Pierson	Daytona Beach	904			
Pine Island	Ft. Myers	941			
Plant City	Tampa	813			
Polk City	Tampa	941			
Pomona Park	Jacksonville	904			
Pompano Beach	Southeast	954			
Ponce de Leon	Pensacola	850			
Ponte Verde Beach	Jacksonville	904			
Port Charlotte	Ft. Myers	941			
Port St. Joe	Panama City	850			
Port St. Lucie	Southeast	561			
Punta Gorda	Ft. Myers	941			
Quincy	Panama City	850			
Railford	Jacksonville	904			

**INSTRUCTIONS FOR COMPLETION
OF NXX FORECAST BY RATE CENTER**

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

