



ORIGINAL

LAW OFFICES

MESSER, CAPARELLO & SELF

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET. SUITE 701 POST OFFICE 804 1876 TALLAHASSEE, FLORIDA 02302-1876 TELEPHONE (804) 222 0720 TELECOPIERS (804) 224 4359 (904) 425 1942

February 3, 1998

BY HAND DELIVERY Ms. Blanca Bayo, Director Division of Records and Reporting Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

980000 - TN

Re: AT&T Wireless Services of Florida, Inc.'s Request for Confidential Classification to Staff Data Request of December 10, 1997

Dear Ms. Bayo:

AT&T Wireless Services of Florida, Inc. ("AWS"), hereby files, pursuant to Section 364.183(1), Florida Statutes, and Rule 25-22.006(5), Florida Administrative Code, certain confidential information in the Commission's undocketed investigation into telephone numbering resources allocation. Pursuant to Rule 25-22.006(5), AWS states:

 AWS is a commercial mobile radio service ("CMRS") provider providing wireless telecommunications service within parts of Florida pursuant to licenses granted by the Federal Communications Commission. As such, AWS is not a "telecommunications company" within the meaning of section 364.02(12), Florida Statutes.

 By a letter dated December 10, 1997, from Mr. Walter D'Haeseleer, the Commission requested from AWS certain company-specific data relating to telephone number utilization for a study of telephone numbering resources. AWS, as a CMRS provider, must utilize NXX codes and other numbering resources in order to make available to its customers wireless telephone service.

3. Numbering resource utilization is an important issue to the industry-at-large and to AWS. Accordingly, AWS believes it can provide useful information to the Commission by participating in this study. However, AWS is filing a Request for Confidential Classification for some of the requested information because many of the responses contain confidential and proprietary business information.

CIVED

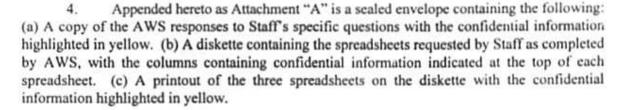
N

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

01733 FEB-38

FPSC-RECTABS/PEPCATING

Ms. Blanca Bayo, Director February 3, 1998 Page 2



Appended hereto as Attachment "B" is two copies of the requested documents with the confidential information deleted.

6. The requested document contains information considered to be confidential and proprietary to AWS, and includes information containing, historic and projected number utilization by NPA/NXX codes and AWS's methodology for such projections, all of which reflects AWS's strategic planning information regarding customer data and business expansion plans. Public disclosure of this information would provide AWS's competitors with an unfair advantage. This information is valuable, it is used by AWS in conducting its business, and AWS strives to keep it secret. Therefore, such information should be classified as proprietary, confidential business information pursuant to Section 364.183(3)(a) and (e), Florida Statutes. Accordingly, it should be held exempt from the public disclosure requirements of Section 119.07, Florida Statutes.

 AWS has treated and intends to continue to treat the information for which confidential classification is sought as private, and this information has not been generally disclosed.

 The original of this Notice has been filed with the Division of Records and Reporting, and a copy (excluding Attachment "A") has been served on Mr. Stan Greer in the Communications Division.

Accordingly, AWS requests that the Commission maintain the Attachment "A" materials as confidential, proprietary business information that is not subject to public disclosure.

Please let me know if there are any questions or further information that is required. Thanks you for your assistance in this matter.

Sincerely, Floyd/R. Self

FRS/amb Enclosures cc: William Higgins, Esq. Mr. John Giannella Mr. Richard Cahall

•