

**AUSLEY & McMULLEN**

**ORIGINAL**

ATTORNEYS AND COUNSELORS AT LAW

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P.O. BOX 391 (ZIP 32302)  
TALLAHASSEE, FLORIDA 32301  
(850) 224-9115 FAX (850) 222-7560

April 14, 1998

**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. 971627-TL

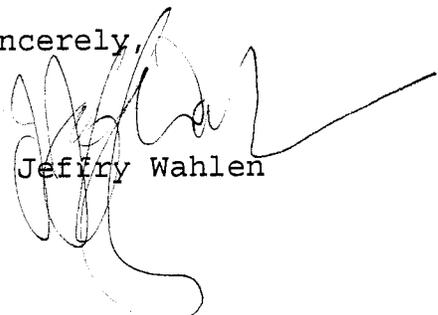
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of ALLTEL Florida, Inc.'s Request for Confidential Classification.

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

ACK \_\_\_\_\_

AFA \_\_\_\_\_ Enclosures

APP \_\_\_\_\_  
cc: All parties of record

CAF \_\_\_\_\_  
CMU \_\_\_\_\_ all\971627.byo

CTR \_\_\_\_\_

EAG \_\_\_\_\_

LEG \_\_\_\_\_

LIN \_\_\_\_\_

OPC \_\_\_\_\_

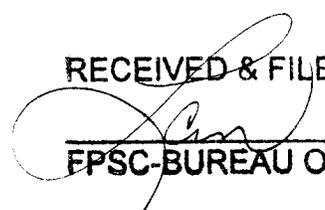
RCH \_\_\_\_\_

SEC \_\_\_\_\_

WAS \_\_\_\_\_

OTH \_\_\_\_\_

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FPSC-BUREAU OF RECORDS

DOCUMENT REPRODUCTION

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7230-4000 3/01-04/98

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by residents of ) DOCKET NO. 971627-TL  
Ft. White requesting extended ) Filed: April 14, 1998  
area service between Ft. White )  
exchange in Columbia County and )  
Gainesville exchange in Alachua )  
County )  
\_\_\_\_\_ )

ALLTEL FLORIDA, INC.'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION

ALLTEL Florida, Inc. ("ALLTEL" or the "Company"), pursuant to Rule 25-22.006, Florida Administrative Code, files this Request for Confidential Classification for certain information provided to the Staff in this docket, and says:

1. This request covers pages 3 and 6 of ALLTEL's traffic study filed on April 14, 1998, in this docket. The traffic study was filed pursuant to Order No. PSC-98-0098-FOF-TL.

2. In accordance with FPSC Rule No. 25-22.006, F.A.C., a copy of the document with the information ALLTEL considers to be proprietary has been filed under a separate cover as Exhibit "A" to this request and has the confidential information highlighted for identification purposes. In accordance with Rule 25-22.006, Florida Administrative Code, ALLTEL has appended hereto as Exhibit "B" one edited copy of the traffic study with this confidential information blacked out ("redacted").

3. Commission Rule 25-22.006(4)(a) provides that a utility may satisfy its burden of proving that information is specified confidential material by demonstrating how the information falls

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REGISTRATION DIVISION

under one or more of the available statutory examples. In the alternative, if no statutory example is available, the utility may satisfy its burden by including a justifying statement indicating what penalties or ill effects on ALLTEL or its ratepayers will result from the disclosure of the information to the public. ALLTEL has identified this confidential information on a line-by-line basis, and has appended such line-by-line identification hereto as Exhibit "C."

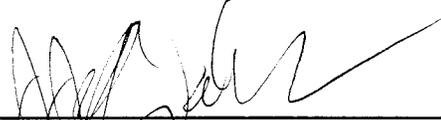
4. The information for which confidential treatment is requested has not been disclosed, except pursuant to a protective agreement that provides that the information will not be released to the public.

5. For all the foregoing reasons, ALLTEL respectfully urges the Commission to classify the above-described and discussed document as proprietary confidential business information pursuant to Rule 25-22.006, Florida Administrative Code, and as such exempt from Chapter 119, Florida Statutes.

WHEREFORE, ALLTEL Florida, Inc. moves the Commission to enter an Order declaring this information to be proprietary confidential business information pursuant to Section 25-22.006, Florida Administrative Code.

DATED this 14th day of April, 1998.

Respectfully submitted,



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LEE L. WILLIS and  
J. JEFFRY WAHLEN of  
Ausley & McMullen  
P. O. Box 391  
Tallahassee, FL 32302  
(850) 224-9115

ATTORNEYS FOR ALLTEL FLORIDA, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U. S. Mail or hand delivery (\*) this 14th day of April, 1998, to the following:

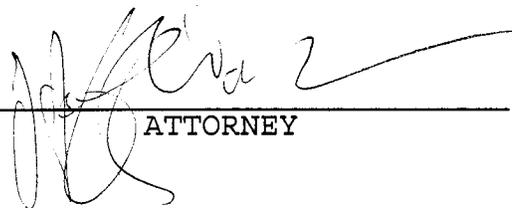
Beth Keating \*  
Division of Legal Services  
Florida Public Service Comm.  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32301

Columbia County Board of  
Commissioners  
Frank Albury  
P. O. Drawer 1529  
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Vonnie Wiggins \*  
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Mike Zimmerman  
Route 2, Box 9192  
Fort White, FL 32038

Nancy H. Sims  
BellSouth Telecommunications  
150 S. Monroe St., Suite 400  
Tallahassee, FL 32301



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ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by residents of ) DOCKET NO. 971627-TL  
Ft. White requesting extended )  
area service between Ft. White )  
exchange in Columbia County and )  
Gainesville exchange in Alachua )  
County )  

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EXHIBIT "B" TO ALLTEL FLORIDA, INC.'S  
REQUEST FOR  
CONFIDENTIAL CLASSIFICATION

Edited (Redacted) Version of Document  
With Confidential Information Blacked Out

ALLTEL FLORIDA, INC.  
DOCKET NO. 971627-TL  
ORDER NO. PSC-98-0098-FOF-TL  
ANALYSIS STATEMENT  
Fort White - Gainesville EAS

All traffic data collected for the calling rate computation for this study is based on the October 1997 billing period. Calling main stations for this study includes 1B, Semi-Public Paystations, PBX Trunks, Key System Lines, Centrex, Customer-Owned Paystations, and 1R. Calling main totals differ from access line totals. Access line totals include Public Paystations and Special Services (Private Lines, Special Access, FX, and Wats.) Totals on both counts exclude test lines and official company lines.

All community of interest factors reported in this study are based on only the usage which ALLTEL bills on behalf of specific interexchange carriers. To the extent other IXC's may be carrying traffic of which we are unaware, the community of interest may be affected. Usage of this type is not available for study by ALLTEL since we do not perform the recording and billing function for all carriers.

FX Lines 1. Fort White (Closed End) - Gainesville - 0

The communities of interest for the citizens residing in the Fort White area for calling to Gainesville are the University of Florida, Medical Facilities, employment, shopping, entertainment, and calling of friends and family.

On the enclosed map the existing EAS routes are shown with solid arrows and the proposed routes are shown with broken arrows.

047-ALLTEL FLORIDA, INC.  
 ONE-WAY CALLING RATES  
 SCHEDULE I  
 NOT INCLUDING FX  
 DOCKET NO. 971627-TL, ORDER NO. PSC-98-0098-FOF-TL

<u>NOT INCLUDING FX</u>	<u>CALLING MAINS</u>			<u>MESSAGES</u>			<u>M/A/M</u>			<u>% CUSTOMERS MAKING 2 OR MORE CALLS</u>		
	<u>BUS</u>	<u>RES</u>	<u>COMB</u>	<u>BUS</u>	<u>RES</u>	<u>COMB</u>	<u>BUS</u>	<u>RES</u>	<u>COMB</u>	<u>BUS</u>	<u>RES</u>	<u>COMB</u>

PART I - ROUTES OVER 3.00  
 1. Fort White to Gainesville



PART II - ROUTES 2.99 to 2.00  
 2. None

PART III - ROUTES 1.99 to 1.00  
 3. None

PART IV - ROUTES BELOW .99  
 4. None

SOURCE: CABS Records - Customer Billing Records Are Not Available : October, 1997

047-ALLTEL FLORIDA, INC.  
EXTENDED AREA SERVICE STUDY  
FORT WHITE - GAINESVILLE

BUSINESS

RESIDENCE

COMBINED

SCHEDULE OF DISTRIBUTION OF CALLS

SCHEDULE OF DISTRIBUTION OF CALLS

SCHEDULE OF DISTRIBUTION OF CALLS

BUSINESS				RESIDENCE				COMBINED			
SCHEDULE OF DISTRIBUTION OF CALLS				SCHEDULE OF DISTRIBUTION OF CALLS				SCHEDULE OF DISTRIBUTION OF CALLS			
A	B	C	D	E	F	G	H	I	J	K	L
NUMBER OF CALLS	CALLING MAIN STATIONS	ACCUMULATED MAIN STATIONS	PERCENT TO ACCUMULATED STATIONS	NUMBER OF CALLS	CALLING MAIN STATIONS	ACCUMULATED MAIN STATIONS	PERCENT TO ACCUMULATED STATIONS	NUMBER OF CALLS	CALLING MAIN STATIONS	ACCUMULATED MAIN STATIONS	PERCENT TO ACCUMULATED STATIONS
1.	26 or more		N/A	26 or more			N/A	26 or more			N/A
2.	25		N/A	25			N/A	25			N/A
3.	24		N/A	24			N/A	24			N/A
4.	23		N/A	23			N/A	23			N/A
5.	22		N/A	22			N/A	22			N/A
6.	21		N/A	21			N/A	21			N/A
7.	20		N/A	20			N/A	20			N/A
8.	19		N/A	19			N/A	19			N/A
9.	18		N/A	18			N/A	18			N/A
10.	17		N/A	17			N/A	17			N/A
11.	16		N/A	16			N/A	16			N/A
12.	15		N/A	15			N/A	15			N/A
13.	14		N/A	14			N/A	14			N/A
14.	13		N/A	13			N/A	13			N/A
15.	12		N/A	12			N/A	12			N/A
16.	11		N/A	11			N/A	11			N/A
17.	10		N/A	10			N/A	10			N/A
18.	9		N/A	9			N/A	9			N/A
19.	8		N/A	8			N/A	8			N/A
20.	7		N/A	7			N/A	7			N/A
21.	6		N/A	6			N/A	6			N/A
22.	5		N/A	5			N/A	5			N/A
23.	4		N/A	4			N/A	4			N/A
24.	3		N/A	3			N/A	3			N/A
25.	2		N/A	2			N/A	2			N/A
26.	1		N/A	1			N/A	1			N/A
27.	0		N/A	0			N/A	0			N/A
28.	TOTALS	N/A	N/A	TOTALS	N/A	N/A		TOTALS	N/A	N/A	
29.	AVERAGE REVENUE PER MESSAGE		N/A	AVERAGE REVENUE PER MESSAGE			N/A	AVERAGE REVENUE PER MESSAGE			N/A

ALLTEL FLORIDA, INC.  
DOCKET NO. 971627-TL  
ORDER NO. PSC-98-0098-FOF-TL  
Fort White - Gainesville EAS

LONG DISTANCE TOLL INFORMATION

Rate Day Period	<u>INIT'L MIN</u>	<u>OVERTIME MIN.</u>	<u>AIRLINE MILES</u>	<u>ARPM</u>
1. Fort White - Gainesville	\$ .19	\$ .19	29	Not Available

ALLTEL FLORIDA, INC.  
DOCKET NO. 971627-TL  
ORDER NO. PSC-98-0098-FOF-TL  
Fort White - Gainesville EAS

ACCESS LINE CLASSIFICATION DATA BY CLASSES OF SERVICE

Toll revenue between the following routes are Intrastate/interLATA and is turned over to the carriers for whom we do billing. ALLTEL bills access to the carriers for this usage out of the Intrastate Access Tariff:

Fort White - Gainesville

The following station classification data reflects the total number of access lines for Fort White as of October 31, 1997.

Fort White

1. 1B
2. Centrex
3. Semi-Pub Paystations
4. Public Paystations
5. Cust Owned Paystations
6. PBX Trunks
7. Key System Lines
8. 1R
9. FX
10. Private Lines
11. WATS
12. TOTALS



ALLTEL FLORIDA, INC.  
DOCKET NO. 971627-TL  
ORDER NO. PSC-98-0098-FOF-TL  
Fort White - Gainesville EAS

The NNX's that can be accessed via EAS today are as follows:

Fort White (497)	Alachua	- 418, 462
	Branford	- 935
	High Springs	- 454
	Lake City	- 207, 719, 752, 754, 755, 758, 961, and 965

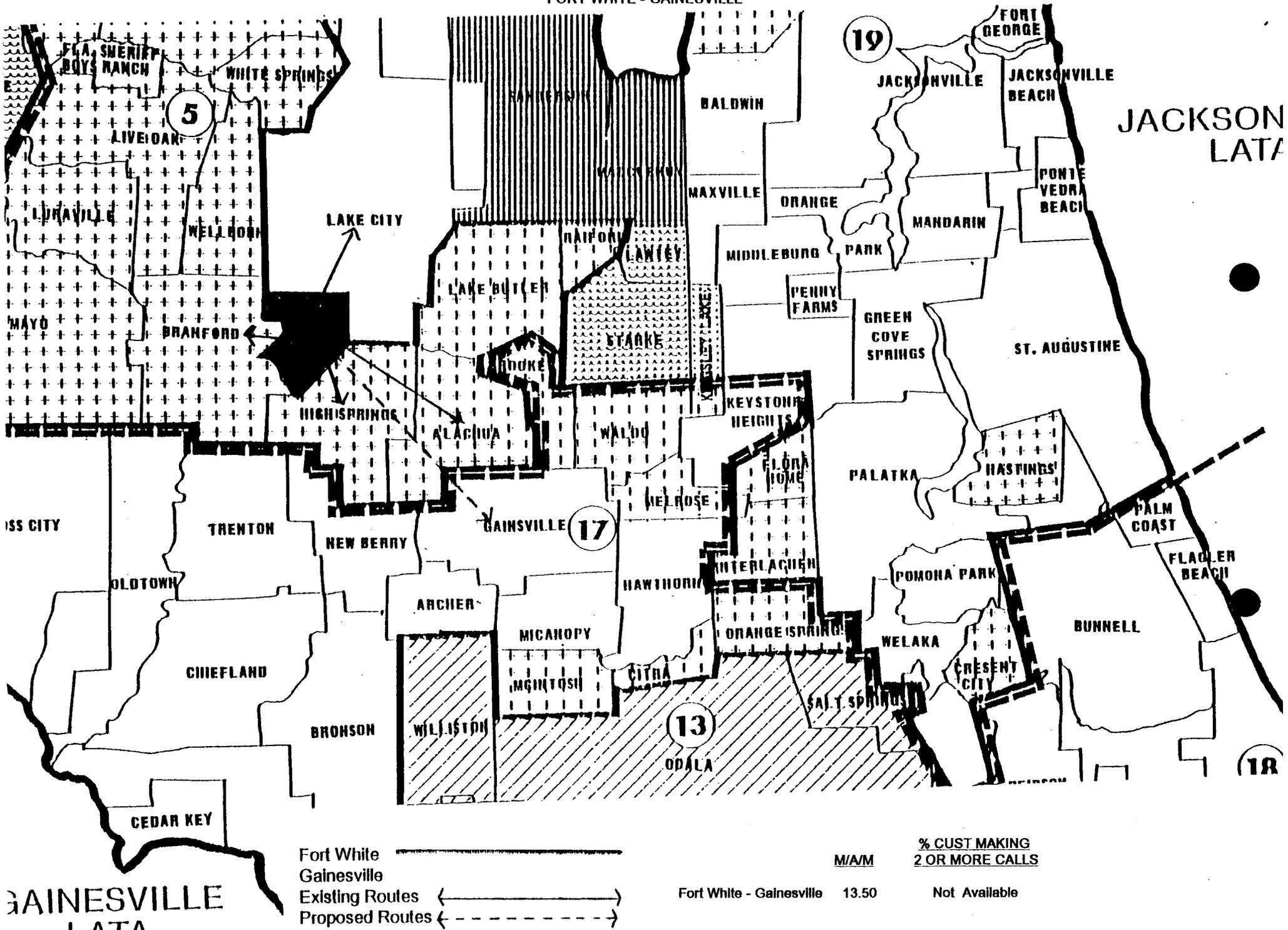
ALLTEL FLORIDA, INC.  
DOCKET NO. 971627-TL  
ORDER NO. PSC-98-0098-FOF-TL  
Fort White - Gainesville EAS

DEMOGRAPHIC DESCRIPTIONS

Fort White

The Fort White Wire Center is located in the southwestern portion of Columbia County. This exchange covers approximately 65 square miles including the unincorporated areas of Wilson Springs and Hollingworth Bluff. The subscriber density for the Fort White service area for October 1997 is projected to have a total of 24.7 customer access lines per square mile.

This central office is a Northern Telecom DMS 10 which provides custom calling and class features for this area.



GAINESVILLE  
 COUNTY

JACKSON  
 COUNTY

ISS CITY

TRENTON

NEW BERRY

GAINESVILLE 17

OLDTOWN

CHIEFLAND

BRONSON

CEDAR KEY

ARCHER

MICAHOPY

MONTGOMERY

WILKINSON

CITRA

13

ODALA

HAWTHORN

INTERLACHEN

ORANGE SPRING

WELAKA

CRESENT CITY

SALT SPRING

PALATKA

POMONA PARK

BUNNELL

PALM COAST

FLAGLER BEACH

18

M/A/M

% CUST MAKING  
 2 OR MORE CALLS

Fort White - Gainesville 13.50

Not Available

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Ft. White requesting extended )  
area service between Ft. White )  
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County )  

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EXHIBIT "C" TO ALLTEL FLORIDA, INC.'S  
REQUEST FOR  
CONFIDENTIAL CLASSIFICATION

Line-By-Line  
Identification

<u>Page</u>	<u>Line(s)</u>	<u>Column</u>	<u>Note</u>
3	1	A - L	1
6	1 - 12	A	2

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**Note 1:** This traffic data is numbers of main stations, messages, M/A/M and percentage of customers making two or more calls, and call distribution data for the Ft. White - Gainesville route. This data for the routes at issue in this proceeding basically provide a blueprint of the toll usage over these routes. Competition in the intraLATA toll market is increasing, and the FPSC has authorized intraLATA presubscription should be implemented. This means that ALLTEL may be subject to presubscribed competition on this route.

Although the traffic information is clearly necessary for a full examination of the merits of the extended area service

request in this case, such information also contains data that indicates which routes at issue in this case contain the most concentrated traffic. The disclosure of such traffic patterns to the public would make available to competitors highly valuable competitive information which such competitors could use to target the most lucrative routes. This disclosure would harm the company by making sensitive traffic data available to competitors at no cost.

**Note 2:** This page shows number of access lines for the Ft. White exchange. As the telecommunications market becomes more competitive, disclosure of this type of information will give competitors important information on market size and growth. More specifically, access line statistics are an indication of how profitable the market can be once entered. These statistics provide potential competitors with accurate demographic information at no cost, which information can be used to compete against and harm ALLTEL.