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October 17, 2005

## VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket No. 050693-TL; Alltel Florida, Inc.'s Petition to Reduce Intrastate  
Switched Access Rates in a Revenue Neutral Manner Pursuant to Section  
364.164, Florida Statutes.

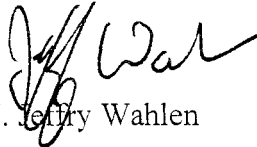
Dear Ms. Bayo:

Enclosed for filing on behalf of Alltel Florida, Inc. ("Alltel") are the original and fifteen  
(15) copies of Alltel's First Motion for Temporary Protective Order.

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

Enclosures

cc: Charles J. Beck, Office of Public Counsel (w/encls.)  
Jason Rojas, Staff Counsel (w/encls.)

(RDR COMP DN  
09999-05)

DOCUMENT NUMBER-DATE

09997 OCT 17 05

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Alltel Florida, Inc.'s Petition	)	
To Reduce Intrastate Switched Network	)	
Access Rates In A Revenue Neutral	)	Docket No.: 050693-TL
Manner Pursuant to Section 364.164,	)	Filed: 10.17.05
Florida Statutes	)	
_____	)	

**ALLTEL'S FIRST MOTION FOR  
TEMPORARY PROTECTIVE ORDER**

Pursuant to Rule 25-22.006, Florida Administrative Code, and Section 364.183(2), Florida Statutes, Alltel-Florida, Inc. ("Alltel") by and through its undersigned counsel, requests that the Florida Public Service Commission enter a Temporary Protective Order covering certain proprietary information provided to the Office of Public Counsel in response to Staff's First Request for Production of Documents ("Staff First RPD") and Staff's First Set of Interrogatories ("Staff First IRR"), exempting the information from Section 119.07(1), Florida Statutes. In support, Alltel states as follows:

1. Contemporaneous with the filing of this request, Alltel served its Answers to Staff's First Set of Interrogatories and Response to Staff's First Request for Production of Documents on counsel for the Staff and Office of Public Counsel. Alltel's answers and responses contain information that Alltel asserts is proprietary confidential business information, specifically, Alltel's Responses to Staff's First Request for Production of Documents, Nos. 8; 12; 15; 18; 19a, b and c; and 20b and c, and Staff's First Set of Interrogatories, No. 13(b) [hereinafter "Confidential Material"]. This Confidential Material was provided to Staff on a CD that was filed with the Division of Commission Clerk and Administrative Services and Alltel's First Notice of Intent to Request Confidential Classification.


2. Section 364.183(2), Florida Statutes, provides in relevant part:

Any records provided pursuant to a discovery request for which proprietary confidential business information status is requested shall be treated by the commission and the Office of Public Counsel and any other party subject to the public records law as confidential and shall be exempt from s. 119.07(1), pending a formal ruling on such request by the commission or the return of the records to the person providing the records.

3. Alltel considers the Confidential Material described above to be proprietary and confidential. Pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, Alltel is requesting this temporary protective order to protect the confidentiality of the information while in possession of the Office of Public Counsel and the Commission pending Alltel's submission of a Request for Confidential Classification and a determination as to whether the Confidential materials will be used in a proceeding before the Commission. Pending further ruling by the Commission regarding the confidential classification of the information, the information should be treated in a confidential manner pursuant to Section 364.183(2), Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

WHEREFORE, Alltel requests a Temporary Protective Order exempting from s. 119.07(1), Florida Statutes, the Confidential Material described herein while in the possession of the Office of Public Counsel, pending Alltel's submission of a Request for Confidential Classification specifically addressing those materials.

DATED this 17<sup>th</sup> day of October, 2005.

  
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and

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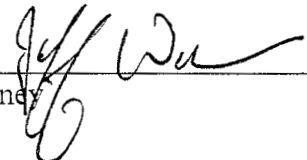
ATTORNEYS FOR  
ALLTEL FLORIDA, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct of the foregoing was served by hand delivery and electronic mail this 17<sup>th</sup> day of October, 2005, to the following:

Jason Rojas  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

Charles J. Beck, Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400

  
\_\_\_\_\_  
Attorney