



2200 IDS Center
80 South 8th Street
Minneapolis MN 55402-2157
tel 612.977.8400
fax 612.977.8650

January 6, 2010

Matthew A. Slaven
(612) 977-8245
mslaven@briggs.com

VIA FEDERAL EXPRESS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

**Re: WC Docket No. 09-197
Eligible Telecommunications Carrier Certification and 2009 Annual Report
of Alltel Communications, LLC for the State of Florida
Supplemental Filing**

Dear Ms. Dortch:

Alltel Communications, LLC (“Alltel”) hereby submits the original and four (4) copies of the following supplemental information to the annual report required by Commission Rule 47 C.F.R. § 54.209:

- PUBLIC VERSION OF ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL REPORT OF ALLTEL COMMUNICATIONS, LLC FOR THE STATE OF FLORIDA – SUPPLEMENTAL FILING
 - Public Version of Supplement to Confidential Exhibit C – Outage Report for period January 1, 2008 through December 31, 2008
- (separate marked envelope) CONFIDENTIAL VERSION OF ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL REPORT OF ALLTEL COMMUNICATIONS, LLC FOR THE STATE OF FLORIDA – SUPPLEMENTAL FILING
 - Supplement to Confidential Exhibit C – Outage Report for period January 1, 2008 through December 31, 2008
- REQUEST FOR CONFIDENTIAL TREATMENT OF EXHIBITS TO ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION AND 2009 ANNUAL REPORT OF ALLTEL COMMUNICATIONS, LLC FOR THE STATE OF FLORIDA – SUPPLEMENTAL FILING

Marlene H. Dortch, Secretary
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Alltel's Request for Confidential Treatment pursuant to 47 C.F.R. §§ 0.457(d) and 0.459 is made with respect to the Supplement to Confidential Exhibit C. The confidential materials are enclosed in a separate, marked envelope.

This filing is submitted for the study areas listed below:

State	Spin	Study Area Code	Study Area Name
FL	143008900	219903	Alltel Communications, LLC

If you have any questions, please contact me.

Respectfully submitted,



Mark J. Ayotte
Matthew A. Slaven
Briggs and Morgan, P.A.
2200 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402
Telephone No. (612) 977-8400

cc: Universal Service Administrative Company
(via email – hccerts@usac.org) (public version only)
Nicholas Degani – FCC
(via email – nicholas.degani@fcc.gov) (confidential version only)
Alltel Communications, LLC

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	WC Docket No. 09-197
Universal Service)	

**REQUEST FOR CONFIDENTIAL TREATMENT
OF EXHIBITS TO ELIGIBLE TELECOMMUNICATIONS CARRIER
CERTIFICATION AND 2009 ANNUAL REPORT OF ALLTEL COMMUNICATIONS,
LLC FOR THE STATE OF FLORIDA
SUPPLEMENTAL FILING**

January 6, 2010

Mark J. Ayotte
Matthew A. Slaven
Briggs and Morgan, P.A.
2200 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402
Telephone No. (612) 977-8400

ATTORNEYS FOR ALLTEL
COMMUNICATIONS, LLC

For the reasons stated herein, Alltel Communications, LLC (“Alltel” or the “Company”) hereby requests that the Supplement to **Confidential Exhibit C** (Outage Report for period January 1, 2008, through December 31, 2008) to the attached Supplemental Filing – Eligible Telecommunications Carrier Certification and 2009 Annual Report of Alltel Communications, LLC for the State of Florida, be treated as confidential and not routinely available for public inspection pursuant to 47 C.F.R. §§ 0.457(d) and 0.459. A redacted copy of **Confidential Exhibit C** is being filed separately today for inclusion in the public record.

The Supplement to **Confidential Exhibit C** contains information that qualifies as “commercial or financial information” that “would customarily be guarded from competitors,” regardless of whether or not such materials are protected from disclosure by a privilege. *See* 47 C.F.R. § 0.457(d); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 879 (D.C. Cir. 1992) (“[W]e conclude that financial or commercial information provided to the Government on a voluntary basis is ‘confidential’ for the purpose of Exemption 4 if it is the kind that would customarily not be released to the public by the person from whom it was obtained.”).

The Supplement to **Confidential Exhibit C** contains highly sensitive network outage information required by 47 C.F.R. § 54.209(a). Specifically, the Wireline Competitive Bureau has requested the number of customers potentially affected with the location of a specific outage previously reported in Alltel’s 2009 Annual Report. Commission Rule 54.209(a) was modeled on the outage reporting requirements in 47 C.F.R. Part 4. When it adopted the Part 4 reporting requirements, the Commission found that such data presents national security and competitive concerns and should be deemed confidential when filed with the Commission. *In the Matter of New Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, ¶ 3 (rel.

Aug. 19, 2004) (“This data, though useful for the analysis of past and current outages in order to increase the reliability and security of telecommunications networks in the future, could be used by hostile parties to attack those networks, which are part of our Nation’s critical information infrastructure. The disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity. We therefore will treat the information that will be provided as confidential.”). The information in the Supplement to **Confidential Exhibit C** is entitled to be treated as confidential for these same reasons.

Respectfully submitted,



Mark J. Ayotte
Matthew A. Slaven
Briggs and Morgan, P.A.
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80 South Eighth Street
Minneapolis, Minnesota 55402
Telephone No. (612) 977-8400

ATTORNEYS FOR ALLTEL
COMMUNICATIONS, LLC

January 6, 2010

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**PUBLIC VERSION
CONFIDENTIAL VERSION FILED UNDER SEPARATE COVER**

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
) **WC Docket No. 09-197**
Federal-State Joint Board on)
Universal Service)

**ELIGIBLE TELECOMMUNICATIONS CARRIER CERTIFICATION
AND 2009 ANNUAL REPORT OF
ALLTEL COMMUNICATIONS, LLC
FOR THE STATE OF FLORIDA**

SUPPLEMENTAL FILING

Background

47 C.F.R. § 54.209(a) requires a common carrier designated by the Commission as an ETC pursuant to Section 214(e)(6) of the Act to annually report certain information no later than October 1 of each calendar year. In satisfaction of the Commission's annual reporting requirement, Alltel Communications, LLC ("Alltel") submitted its Annual Report on October 1, 2009 for the period January 1, 2008 through December 31, 2008 (the "Annual Report"). On December 1, 2009, Alltel received a request from the Wireline Competition Bureau ("WCB") seeking additional information relating to its Annual Report. Alltel respectfully submits this Supplemental Filing in response to the WCB's December 1, 2009 request for additional information.

The information contained in this filing represents commercial and financial trade secrets regarding Alltel's network build-out plans and other matters that are highly sensitive due to the competitive nature of the commercial wireless industry. Accordingly, contemporaneous with this filing, Alltel is making a filing to request that the Commission treat this data as confidential and withhold it from public inspection, pursuant to Sections 0.457(d)(1) and 0.459 of the rules.

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Outage Reporting

47 C.F.R. § 54.209(a)(2) requires an ETC to annually report network outages within its ETC designated area. 47 C.F.R. § 54.209(a)(2) requires an ETC to report any outage lasting at least 30 minutes that potentially affects at least ten percent of the end users served in a designated service area or an outage affecting a 911 special facility. In addition, the rule generally requires an ETC to report the number of customers affected by the outage. Alltel submitted outage reports as Confidential Exhibit C to the Annual Report and reported a 911 facility outage regardless of whether customers were affected by the outage. The Alltel network includes redundancies to ensure the network can operate in emergency situations. Therefore, there may have been no customers affected by the reported outage. The WCB however requested that Alltel identify the number of customers that were "potentially" affected by a reported 911 outage.

Again, while it has designed redundancies into its network and no customers may have been affected by a reported 911 outage, the number of customers who, as of December 31, 2008, had a billing address in each wire center associated with the location of the specific reported outage are identified on Supplement to Confidential Exhibit C.

Respectfully submitted,

Alltel Communications, LLC

By 

Mark R. Smith
Assistant Secretary

Confidential Exhibits Attached

**PUBLIC VERSION
CONFIDENTIAL VERSION FILED UNDER SEPARATE COVER**

Alltel Communications, LLC¹
Supplement to Confidential Exhibit C

Florida

**THIS EXHIBIT IS WITHHELD FROM THE PUBLIC COPY
AS THE FILER HAD REQUESTED CONFIDENTIAL TREATMENT**

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¹ The information included in this supplement concerns Alltel Communications, LLC operations during calendar year 2008. Alltel's designated ETC service area in Florida has been assigned Study Area Code (SAC) 219903.