

1 territory. This information does not, however, include lines lost due to bypass and
2 other technologies (e.g., wireless, cable, etc.), which are significant.

3 The following information is confidential.

	A	B
4	<u>Line Type</u>	<u>Dec-00</u>
5	Resale Lines	23,319
6	Unbundled Loops	5,757
7	Unbundled Platforms	0

8 2. How many residential lines have ALECs captured in Verizon's exchanges in
9 Florida?

10 Response

11 Verizon cannot answer this question, as only the ALECs know how many lines
12 they have captured in Verizon's exchanges. Below, Verizon is only able to provide
13 information on number of resold lines, unbundled loops and platforms in its
14 territory. This information does not, however, include lines lost due to bypass and
15 other technologies (e.g., wireless, cable, etc.), which are significant.

16 The following information is confidential.

	A	B
17	<u>Line Type</u>	<u>Dec-00</u>
18	Resale Lines	72,348
19	Unbundled Loops	211
20	Unbundled Platforms	0

21 3. Explain in detail how Verizon factored into its proposed economic lives the threat of
22 bypass by emerging technologies such as wireless local loop technologies.

23 Response

24 As explained in the testimony of Verizon witness Sovereign, Verizon considers
25 competitive risk, as well as technological developments, in determining
26 depreciation inputs. Bypass, whether by wireless local loop, cable technology, or
27 competitors' fiber and/or switches must all be considered when determining
28 depreciation inputs. Mr. Sovereign lists ample evidence of competition for Verizon
29 Florida in his direct testimony.

This confidentiality request was filed by or
for a "telco" for DN 04646-02. No ruling
is required unless the material is subject to a
request per 119.07, FS, or is admitted in the
record per Rule 25-22.006(8)(b), FAC.

(x-ref. DN 14145-01)

appeal
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1 Broadband and Cox already offer local telephone service over its cable television
2 lines in some parts of the country. Cable modems from competitors such as AT&T
3 Broadband, Time Warner, and Cox offer direct competition to Verizon's DSL
4 services.

5 11. When does Verizon plan to no longer add any metallic cable plant in Florida?

6 **Response**

7 There are no plans to stop the deployment of metallic cable plant installations in
8 Florida.

9 12. Please provide a percentage breakdown as of 1/1/2000 of the metallic cable
10 facilities between interoffice, feeder, and distribution. The response should also
11 include a detailed explanation as to how this percentage breakdown was
12 determined.

13 **Response**

14 The following information is confidential.

	A	B	C
15	A. Percentage figures:		
16	• IOF	Metallic	0.00 %
17	• Feeder	Metallic	8.12 %
18	• Distribution	Metallic	83.02 %
19	• IOF	Fiber	5.94 %
20	• Feeder	Fiber	2.92 %
21	• Distribution	Fiber	0.00 %
22	• Total:		100.00 %

23 **B. Explanation of how percentage breakdown was determined:**

24 1. A special study was conducted to identify metallic footage feeder and
25 distribution in service on 1/1/2000. The source of this data was the ICGS Data
26 Base.

- 27 • Metallic IOF facilities in Verizon Florida is zero. (i.e., Verizon Florida
28 Region IOF is served completely by fiber optic systems.)

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1 2. A special study was conducted to identify the footage of Fiber Optic Cable
2 which was in service on 1/1/2000. The source of this data was the ICGS Data
3 Base.

4 3. Available fiber optic data does not differentiate between IOF, Feeder, and
5 Distribution. This information was developed based on a three-year average of the
6 major Program Category (PCAT) codes associated with work orders:
7 • IOF (GX03) 67 % of fiber
8 • Feeder (GH00) 14 % of fiber
9 • Access (GH23) 19 % of fiber

10 By multiplying the Total Fiber Optic Footage from ICGS by these percentage
11 figures, the footage associated with these categories was developed.
12 Access is fiber optical cable associated customer broadband services (i.e., DS-3
13 and above.) For purpose of this analysis Access was included in feeder
14 numbers. Distribution is essentially zero since it there is only a single Fiber to
15 the Curb system in Florida. This system is located in the Hyde Park Central
16 Office.

17 4. From the footages, relative percentages were developed.

18 13. Please list the services that cannot be provided over copper facilities.

19 **Response**

20 Typically, DS3 (44.7Mb/s) and above services cannot be provided over copper. In
21 addition, SONET type services cannot be provided over copper. But, there are
22 other loop parameters (length, /gauge, etc.) that may require conditioning or
23 repeaters to be installed to provide lower services (1.5Mb/s for example).

24 14. What are Verizon's plans for deploying ADSL or HDSL technologies?

25 **Response**

26 Verizon Florida objects to this interrogatory because, to the extent responsive data
27 exists, it is proprietary and highly confidential competitive information. Verizon
28 Florida further objects to this interrogatory on the grounds that planning information
29 is irrelevant to selecting a cost model to determine the long run, forward-looking
30 cost of providing unbundled network elements and is not otherwise relevant to any
31 issue in this proceeding.

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1 Notwithstanding the above objection, Verizon Florida responds as follows:

2 The following information is confidential.

3 ADSL Strategy: Verizon's data affiliate, Verizon Advanced Data, Inc (VADI) has
4 been deploying ADSL via DSLAMs primarily located in Central Offices. Verizon
5 Florida Inc. has only recently been granted authorization by the FCC to deploy
6 ADSL. Plans are underway to reintegrate the ADSL operation into Verizon Florida
7 Inc.

8 HDSL Strategy: Current plans for deployment are based mostly on customer
9 demand. Fiber should be utilized in high demand areas, whereas copper should
10 be utilized in lower demand locations.

11 15. What are Verizon's plans for deploying SONET?

12 **Response**

13 Verizon Florida objects to this interrogatory because, to the extent responsive data
14 exists, it is proprietary and highly confidential competitive information. Verizon
15 Florida further objects to this interrogatory on the grounds that planning information
16 is irrelevant to selecting a cost model to determine the long run, forward-looking
17 cost of providing unbundled network elements and is not otherwise relevant to any
18 issue in this proceeding.

19 Notwithstanding the above objection, Verizon Florida responds as follows:

20 The following information is confidential.

21 Verizon is committed to deploying SONET systems in the network working towards
22 100% SONET deployment. SONET equipment is deployed where feasible when
23 relief is needed.

24 16. How does Verizon determine when a feeder or distribution transmission facility
25 needs to be replaced?

26 **Response**

27 Verizon replaces these facilities when the facilities cause excessive troubles and
28 when an approved business case supports this replacement.

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1 Verizon is currently exploring the application of Voice Telephony over ATM (VToA)
2 switching in Florida in a First Office Application (FOA) in Tampa. The FOA
3 involves use of the VToA application in a Tandem switching arrangement. No
4 other plans have been documented to utilize ATM for voice switching applications
5 in Florida.

6 21. What is Verizon's current deployment strategy for fiber cable in the feeder,
7 interoffice, and distribution portions of the network?

8 **Response**

9 Verizon objects to this interrogatory because, to the extent responsive data exists,
10 it is proprietary and highly confidential competitive information. Verizon further
11 objects to this interrogatory on the grounds that planning information is irrelevant to
12 selecting a cost model to determine the long run, forward-looking cost of providing
13 unbundled network elements and is not otherwise relevant to any issue in this
14 proceeding.

15 Notwithstanding the above objection, Verizon Florida responds as follows:

16 The following information is confidential.
17 Feeder deployment: fiber fed pair gain systems where most economically feasible.
18 Interoffice: 100% of all interoffice facilities which are added are fiber.
19 Distribution: High bandwidth customers receive fiber optic cables.

20 22. (a) Provide an exhaustive list of all competitors Verizon benchmarked its asset
21 lives against.

22 (b) Of the competitors Verizon used for benchmarking purposes, identify those
23 who are currently involved in bankruptcy proceedings.

24 **Response**

25 (a) All competitors used as benchmarks are identified in the direct testimony of
26 Verizon witness Sovereign.

27 (b) Mr. Sovereign has not completed an exhaustive survey on the financial status
28 of the benchmarked competitors, although he is aware that both NorthPoint
29 and Rhythms are involved in bankruptcy. Verizon notes that regardless of the
30 financial status of a specific competitor, the competitor's assets have value

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1 The SS7 module contains investment for STP locations in Virginia, Indiana, and
2 California. Verizon utilized each of these state's material loadings when
3 developing investment for SS7 as these loadings are more representative of cost
4 at these locales. See also the responses to Interrogatory Number 31 (d).

5 54. What portion of the feeder portion of the Verizon Florida network is currently fiber?

6 **Response**

7 The following information is confidential.
8 26.4% of the feeder portion of the Verizon Florida network was on fiber as of
9 1/1/2000.

10 55. What portion of the distribution portion of the Verizon Florida network is currently
11 fiber?

12 **Response**

13 The following information is confidential.
14 Essentially 0% of the distribution portion of the Verizon Florida network is on fiber.
15 See the response to question 12.

16 56. Does Verizon track or maintain data on the number of customers and the amount
17 of revenue it has lost due to increased competition in Florida as a result of the
18 passage of the Telecommunications Act of 1996? If so, how many customer and
19 how much revenue did Verizon lose in the period 1996-2000?

20 **Response**

21 It would be impossible for Verizon to accurately track such information. For
22 instance, Verizon does not know how many customers it would have gained, but
23 didn't, because of competition. It also doesn't know the amount of revenue it could
24 have received from any given customer lost to a competitor. As explained above,
25 Verizon does maintain information on the number of resold lines, UNE loops and
26 UNE-Ps; however, this data is reported on a line basis, not by customer, and
27 represents only a fraction of the total lost lines since it does not include the number
28 of lines lost due to network bypass and substitute technologies such as wireless
29 and cable.

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1 density grids, the road feet adjustment factor is not applied. The plant mix inputs
2 affect the placement costs of the cable as well as the quantity of poles, pull boxes,
3 manholes and conduit placed.

4 65. Is the network protected in Verizon's cost model a packet switched network or a
5 circuit switch-based network?

6 **Response**

7 ICM models a circuit switched network for voice services.

8 66. Identify all existing remotes and concentrators by exchange in Florida.

9 **Response**

10 Verizon Florida has undertaken a special study to compile the current list of
11 remotes and concentrators in the Florida service area.

12 The following information is Company confidential.

13 The list of Central Office remotes, which currently operate as remote switches is:

14	Alturas	Lake Wales East
15	Babson Park	Mulberry
16	Bradley Junction	Polk City
17	Bayshore	Poinciana
18	Haines City North	Parrish
19	Indian Lake	St. Armands Key

20 The current list of concentrators by exchange is as follows.

21	A	B
	Exchange	Concentrators
22	Alafia	22
23	Alturas	6
24	Auburndale	13
25	Babson Park	6
26	Bartow	12
27	Bayou	17
28	Bayshore	1

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<u>A</u>	<u>B</u>
Beach Park	17
Bradenton Bay	12
Bradenton Main	10
Bradley Junction	7
Brandon	53
Carrollwood	21
Clearwater	8
Countryside	11
Cypress Gardens	12
Dundee	12
Dunedin	2
Englewood	12
Feathersound	8
Frostproof	16
Gandy	5
Haines City	27
Haines City – North	15
Highlands	19
Hudson	10
Hyde Park	9
Indian Lakes	8
Indian Rocks	8
Keystone	11
Lake Alfred	6
Lake Wales	18
Lake Wales East	10
Lakeland East	11
Lakeland Main	15
Lakeland North	29
Land O' Lake	12
Largo	8
Lealman	20
Longboat	3
Lutz	13
Moon Lake	8
Mulberry	3
Myakka City	16
New Port Richey	10
North Gulf	25
North Port	24
Oldsmar	22
Osprey	4

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<u>A</u>	<u>B</u>
Palmetto	8
Palma Sola	7
Parrish	12
Pasadena	5
Pinecrest	7
Pinellas	29
Plant City	33
Polk City	18
Ruskin	7
Sarasota Main	5
Sarasota Northside	13
Sarasota Southside	21
Sarasota Springs	16
Seminole	5
Seven Springs	11
Siesta Key	2
Skyway	5
South Gulf Beach	3
St. George	15
St. Petersburg Main	8
St. Petersburg South	2
Sulphur Springs	20
Sweetwater	19
Tampa East	28
Tampa Main	3
Tampa Westside	13
Tarpon Springs	15
Temple Terrace	12
Thonotosassa	15
University	19
Venice Main	5
Venice South	7
Wallcraft	7
Wesley Chapel	19
Wimauma	21
Winter Haven	27
Ybor	12
Zephyrhills	28

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67. Identify all remotes and concentrators by exchange projected in the network in Verizon's cost model.

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1 Response

2 The following information is Company confidential.

3 The remote switches are the following wire centers:

	<u>A</u>	<u>B</u>	<u>C</u>
4	<u>CLLI</u>	<u>NAME</u>	<u>Switch Type</u>
5	ALTRFLXARSA	Alturas	REM GTD-5
6	BBPKFLXARSA	Babson Park	REM GTD-5
7	BRJTFLXARSA	Bradley	REM GTD-5
8	BYSHFLXA84H	Bayshore/	REM GTD-5
9	HNCYFLXN424	Haines City North	REM GTD-5
10	INLKFLXARSA	Indian Lake	REM GTD-5
11	LKWFLXERSA	Lake Wales East	REM GTD-5
12	MLBYFLXARSA	Mulberry	REM GTD-5
13	PKCYFLXARSA	Polk City	REM GTD-5
14	POINFLXARSA	Poinciana	REM GTD-5
15	PRSHFLXARSA	Parrish	REM GTD-5
16	SARKFLXARSA	St. Armands Key	REM GTD-5

17 ICM-FL models DLCs in each wire center as shown below:

	<u>A</u>	<u>B</u>	<u>C</u>
18	<u>CLLI</u>	<u>NAME</u>	<u>Number of DLCs</u>
19	ABDLFLXA96H	AUBURNDALE 1	10
20	ALFAFLXA67H	ALAFIA 1	15
21	ALTRFLXARSA	ALTURAS 1	5
22	BARTFLXA53H	BARTOW	11
23	BAYUFLXA54H	BAYOU 1	16
24	BBPKFLXARSA	BABSON PARK 1	3
25	BHPKFLXA28H	BEACH PARK	4
26	BRBAFLXA75H	BRADENTON BAY 1	13
27	BRJTFLXARSA	BRADLEY 1	6
28	BRNDFLXA68H	BRANDON	50
29	BRTNFLXX74H	BRADENTON MAIN 1	13
30	BYSHFLXA84H	BAYSHORE 1	1
31	CLWRFLXA44H	CLEARWATER 1	21
32	CNSDFLXA79H	COUNTRYSIDE 1	23
33	CRWDFLXA96H	CARROLLWOOD 1	33
34	CYGRFLXA32H	CYPRESS GARDENS 1	10
35	DNDNFLXA73H	DUNEDIN 1	11
36	DUNDFLXA43H	DUNDEE 1	12

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<u>A</u>	<u>B</u>	<u>C</u>
ENWDFLXA47H	ENGLEWOOD 1	9
FHSDFLXA57H	FEATHERSOUND	6
FRSTFLXA63H	FROSTPROOF 1	11
GNDYFLXA57H	GANDY 1	9
HDSNFLXA86H	HUDSON 1	19
HGLDFLXA64H	HIGHLANDS 1	16
HNCYFLXA42H	HAINES CITY MAIN 1	10
HNCYFLXN424	HAINES CITY NORTH 1	5
HYPKFLXADS0	HYDE PARK	6
INLKFLXARSA	INDIAN LAKE 1	4
INRKFLXX59H	INDIAN ROCKS 1	10
KYSTFLXA92H	KEYSTONE 1	9
LGBKFLXA38H	LONGBOAT KEY 1	5
LKALFLXA95H	LAKE ALFRED 1	5
LKLDFLXA68H	LAKELAND MAIN	20
LKLDFLXE66H	LAKELAND EAST	13
LKLDFLXN85H	LAKELAND NORTH	19
LKWFLXA67H	LAKE WALES MAIN 1	7
LKWFLXERSA	LAKE WALES EAST 1	8
LLMNFLXADS0	LEALMAN	20
LNLKFLXA99H	LAND O LAKES	8
LRGOFLXA58H	LARGO	7
LUTZFLXA94H	LUTZ 1	10
MLBYFLXARSA	MULBERRY 1	6
MNLKFLXA85H	MOON LAKE 1	5
MYCYFLXA32H	MYAKKA 1	11
NGBHFLXA39H	NORTH GULF BEACH 1	23
NPRCFLXA84H	NEW PORT RICHEY 1	21
NRPTFLXA42H	NORTH PORT 1	20
NRSDFLXA35H	SARASOTA NORTHSIDE 1	12
OLDSFLXA85H	OLDSMAR 1	14
OSPRFLXA96H	OSPREY 1	6
PKCYFLXARSA	POLK CITY 1	10
PLMTFLXA72H	PALMETTO 1	12
PLSLFLXA79H	PALMA SOLA 1	8
PNCRFLXA73J	PINECREST 1	5
PNLSFLXA53H	PINELLAS 1	23
POINFLXARSA	POINCIANA 1	1
PRSHFLXARSA	PARRISH 1	8
PSDNFLXA34H	PASADENA 1	12
PTCYFLXA75H	PLANT CITY	12
RSKNFLXA64H	RUSKIN 1	9

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	<u>A</u>	<u>B</u>	<u>C</u>
1	SEKYFLXA34H	SIESTA KEY 1	2
2	SGBEFLXA36H	SOUTH GULF BEACH 1	6
3	SKWYFLXADS0	SKYWAY	11
4	SLSPFLXA93H	SULPHUR SPRINGS 1	16
5	SMNLFLXA23H	SEMINOLE	6
6	SNPFLXA37H	SEVEN SPRINGS	8
7	SPBGFLXA89H	ST. PETERSBURG MAIN 1	11
8	SPBGFLXS86H	ST. PETERSBURG SOUTH 1	2
9	SPRGFLXA37H	SARASOTA SPRINGS 1	8
10	SRSTFLXA95H	SARASOTA MAIN 1	15
11	SSDSFLXA92H	SARASOTA SOUTHSIDE 1	21
12	STGRFLXA78H	ST. GEORGE 1	26
13	SWTHFLXA88H	SWEETWATER 1	16
14	TAMPFLXEDS0	TAMPA EAST	24
15	TAMPFLXX22H	TAMPA MAIN 1	3
16	THNTFLXADS0	THONOTOSASSA	8
17	TMTRFLXADS0	TEMPLE TERRACE	12
18	TRSPFLXA93H	TARPON SPRINGS 1	21
19	UNVRFLXA97H	UNIVERSITY	15
20	VENCFLXA48H	VENICE MAIN 1	9
21	VENCFLXSDS0	VENICE SOUTH	11
22	WIMMFLXA63H	WIMAUMA 1	10
23	WLCHFLXA97H	WESLEY CHAPEL 1	14
24	WLCRFLXA83H	WALLCRAFT	17
25	WNHNFLXC29H	WINTER HAVEN	11
26	WSSDFLXA87H	TAMPA WESTSIDE 1	15
27	YBCTFLXA24H	YBOR	5
28	ZPHYFLXA78H	ZEPHYRHILLS 1	15

29 68. Discuss the capacity considerations of SONET rings.

30 **Response**

31 SONET rings are sized to accommodate the total interoffice traffic offered, both
32 switched and non-switched.

33 69. Explain how the model would be modified if additional parties were to add to a
34 structure. For example, if an additional party added cable to a pole how would
35 the new structure sharing rates be determined.