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April 29, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

Re: Docket No. 990649B-TP
Investigation into Pricing of Unbundled Network Elements (Sprint/Verizon track)

Dear Ms. Bayo:

At the request of Commission Staff, Verizon Florida Inc. is enclosing supplemental documentation for previously submitted Requests for Confidential Classification as follows:

1. Responses to Staff's Amended First Set of Interrogatories (Nos. 1, 2, 12, 14, 15, 20, 21, 54, 55, 66, 67) (original request filed November 7, 2001); 04645-02
04646-02
2. Confidential Exhibit DBT-3 (Direct Testimony of Dennis B. Trimble) (original request filed November 7, 2001); 04647-02
04648-02
3. Responses to Staff's Second Set of Interrogatories (No. 59) and Second Request for Production of Documents (Nos. 27 and 44) (original request filed January 16, 2002); 04649-02
04650-02
4. Responses to Staff's Third Request for Production of Documents (Nos. 49, 50, 53, 57, 58, 59) (original request filed January 25, 2002); 04651-02
04652-02
5. Responses to AT&T/MCI's First Set of Interrogatories (No. 43) and First Request for Production of Documents (Nos. 3,6,13,14) (original request filed February 27, 2002); 04653-02
04654-02
6. Responses to Staff's Fifth Set of Interrogatories (No. 108) (original request filed February 28, 2002); 04655-02
04656-02


Ms. Blanca S. Bayo
April 29, 2002
Page 2

7. Responses to Staff's Fifth Request for Production of Documents (Nos. 65 and 67) (original request filed March 6, 2002);
04657-02
04658-02
8. Confidential Exhibit DGT-5 (Surrebuttal Testimony of David G. Tucek) (original response filed March 18, 2002); and
04659-02
04660-02
9. Responses to Staff's First Request for Production of Documents (No. 3) (original request filed December 21, 2001).
04661-02
04662-02

Highlighted copies of the confidential information are attached in sealed envelopes together with one redacted copy and a line-by-line justification (Exhibit-C).

If there are any questions regarding this filing, please contact me at 813-483-2617.

Sincerely,


KC
Kimberly Caswell

KC:tas
Enclosures

c: Jason Fudge, Staff Counsel (w/e)

ORIGINAL

9906498-TP

Exhibit C
Dennis Trimble's Direct Testimony
Exhibit DBT-3

PageNo.	Line(s)/Column(s)	Reason
P. 1-3 P. 4-6	Columns C and D Columns C-J	Wire center specific costs for 2-wire, 4-wire and DS1 loops. Detailed information about Verizon's cost at a geographically disaggregated level will give competitors an artificial advantage in fashioning their entry and expansion strategies in the most effective manner. Information would allow competitors to know where Verizon might be most vulnerable to competition and what areas might be unduly costly to serve.

DOCUMENT NUMBER-D

04647 APR 29

FPSC-COMMISSION CL

VERIZON FLORIDA INC.
(formerly GTE Florida, Inc.)
Unbundled Network Elements

Deaveraging Proposal Based on 2-Wire UNE Loops
Zone 1

Deaveraged Zone	Avg 2-Wire Loop Costs *	Number of Wire Centers	Number of Lines	Percent of Lines
Zone 1	\$18.94	45	1,661,905	66.8%
Zone 2	\$27.68	32	765,779	30.8%
Zone 3	\$74.16	13	59,111	2.4%
Statewide:	\$22.94	90	2,486,795	100.0%

* Average Loop Costs are from ICM-FL and include the NID

ZONE 1 = VZ Statewide Average 2-Wire Loop Costs = \$22.94

ZONE 2 = 200% of VZ Statewide Average 2-Wire Loop Costs = \$45.88

ZONE 3 = Greater than 200% of VZ Statewide Average 2-Wire Loop Costs

A	B	C	D	E
CLLI Code	Wire Center Name	Avg. Cost per Loop	Number of Lines	Zone
TAMPFLX22H	TAMPA MAIN			1
BHPKFLX28H	BEACH PARK			1
UNVRFLX97H	UNIVERSITY			1
SPBGFLX89H	ST. PETERSBURG MAIN			1
SEKYFLX34H	SIESTA KEY			1
SRSTFLX95H	SARASOTA MAIN			1
SARKFLXARSA	ST. ARMANDS KEY			1
GNDYFLX57H	GANDY			1
WSSDFLX87H	WESTSIDE			1
SGBEFLX36H	SOUTH GULF BEACH			1
INRKFLX59H	INDIAN ROCKS			1
SWTHFLX88H	SWEETWATER			1
FHSDFLX57H	FEATHER SOUND			1
CLWRFLX44H	CLEARWATER			1
SPBGFLX586H	ST. PETERSBURG SOUTH			1
LRGOFLX58H	LARGO			1
HYPKFLXADS0	HYDE PARK			1
CNSDFLX79H	COUNTRYSIDE			1
TMTRFLXADS0	TEMPLE TERRACE			1
PSDNFLX34H	PASADENA			1
ANMRFLX77H	ANNA MARIA			1
BRBAFLX75H	BRADENTON BAY			1
PNLNFLX53H	PINELLAS			1
SNSPFLX37H	SEVEN SPRINGS			1
DNDNFLX73H	DUNEDIN			1
LGBKFLX38H	LONGBOAT			1
WLCRFLX83H	WALLCRAFT			1
BAYJFLX54H	BAYOU			1
SLSPFLX93H	SULPHUR SPRINGS			1
NGBHFLX39H	NORTH GULF BEACH			1
SMNFLX23H	SEMINOLE			1
LLMNFLXADS0	LEALMAN			1
YBCTFLX24H	YBOR CITY			1
VENCFLX48H	VENICE MAIN			1
ENWDFLX47H	ENGLEWOOD			1
OLDSFLX85H	OLDSMAR			1
BRTNFLX74H	BRADENTON MAIN			1
SKWYFLXADS0	SKYWAY			1
STGRFLX78H	ST. GEORGE			1
CRWDFLX96H	CARROLLWOOD			1
SSDSFLX92H	SOUTHSIDE			1
LKLDFLX68H	LAKELAND MAIN			1
NPRCFLX84H	NEW PORT RICHEY			1
PLSLFLX79H	PALMA SOLA			1
VENCFLXSDS0	VENICE SOUTH			1

REDACTED

VERIZON FLORIDA INC.
(formerly GTE Florida, Inc.)
Unbundled Network Elements

Deaveraging Proposal Based on 2-Wire UNE Loops
Zone 2

A	B	C	D	E
CLI Code	Wire Center Name	Avg. Cost per Loop	Number of Lines	Zone
BRNDFLXA68H	BRANDON			2
NRSDFLXA35H	NORTHSIDE			2
TAMPFLXEDS0	TAMPA EAST			2
TRSPFLXA93H	TARPON SPRINGS			2
HGLDFLXA64H	HIGHLANDS			2
SPRGFLXA37H	SARASOTA SPRINGS			2
CYGRFLXA32H	CYPRESS GARDENS			2
WNHNFLXC29H	WINTER HAVEN			2
LUTZFLXA94H	LUTZ			2
OSPRFLXA96H	OSPREY			2
ABDLFLXA96H	AUBURNDALE			2
LKLDLXE66H	LAKELAND EAST			2
HDSNFLXA86H	HUDSON			2
BARTFLXA53H	BARTOW MAIN			2
ZPHYFLXA78H	ZEPHYR HILLS			2
PLMTFLXA72H	PALMETTO			2
WLCHFLXA97H	WESLEY CHAPEL			2
ALFAFLXA67H	ALAFIA			2
LKWFLXA67H	LAKE WALES MAIN			2
RSKNFLXA64H	RUSKIN			2
NRPTFLXA42H	NORTHPORT			2
LKLDLXN85H	LAKELAND NORTH			2
HNCYFLXA42H	HAINES CITY MAIN			2
KYSTFLXA92H	KEYSTONE			2
MLBYFLXARSA	MULBERRY			2
PTCYFLXA75H	PLANT CITY			2
BYSHFLXA84H	BAYSHORE			2
POINFLXARSA	POINCIANA			2
THNTFLXADS0	THONOTOSASSA			2
WIMMFLXA63H	WIMAUMA			2
MNLKFLXA85H	MOON LAKE			2
HNCYFLXN424	HAINES CITY NORTH			2

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VERIZON FLORIDA INC.
(formerly GTE Florida, Inc.)
Unbundled Network Elements

Deaveraging Proposal Based on 2-Wire UNE Loops
Zone 3

A CLLI Code	B Wire Center Name	C Avg. Cost per Loop	D Number of Lines	E Zone
BBPKFLXARSA	BABSON PARK			3
LKALFLXA95H	LAKE ALFRED			3
DUNDFLXA43H	DUNDEE			3
LNLKFLXA99H	LAND O' LAKES			3
ALTRFLXARSA	ALTURAS			3
PNCRFLXA73J	PINECREST			3
PKCYFLXARSA	POLK CITY			3
FRSTFLXA63H	FROSTPROOF			3
LKWLFLXERSA	LAKE WALES EAST			3
BRJTFLXARSA	BRADLEY			3
PRSHFLXARSA	PARRISH			3
INLKFLXARSA	INDIAN LAKE			3
MYCYFLXA32H	MYAKKA CITY			3

REDACTED

VERIZON FLORIDA INC.
STATE OF FLORIDA
Unbundled Network Elements
Deaveraging Proposal Based on 2-Wire UNE Loops
Resulting Deaveraged Costs for 4-Wire and Subloop Elements

A	B	C	D	E	F	G	H	I	J
Zone 1 Wire Centers									
Wire Center Name	CLLI Code	4-Wire Avg Loop	DS-1 Loop	2-Wire Avg Feeder	4-Wire Avg Feeder	2-Wire Avg Distribution	4-Wire Avg Distribution	2-Wire Avg Drop	4-Wire Avg Drop
TAMPA MAIN	TAMPFLX22H								
BEACH PARK	BHPKFLX28H								
UNIVERSITY	UNVRFLXA97H								
ST. PETERSBURG MAIN	SPBGFLXA89H								
SIESTA KEY	SEKYFLXA34H								
SARASOTA MAIN	SRSTFLXA95H								
ST. ARMANDS KEY	SARKFLXARSA								
GANDY	GNDYFLXA57H								
WESTSIDE	WSSDFLXA87H								
SOUTH GULF BEACH	SGBEFLXA36H								
INDIAN ROCKS	INRKFLEX59H								
SWEETWATER	SWTHFLXA88H								
FEATHER SOUND	FHSDFLXA57H								
CLEARWATER	CLWRFLXA44H								
ST. PETERSBURG SOUTH	SPBGFLXS86H								
LARGO	LRGOFLXA58H								
HYDE PARK	HYPKFLXADS0								
COUNTRYSIDE	CNSDFLXA79H								
TEMPLE TERRACE	TMTRFLXADS0								
PASADENA	PSDNFLXA34H								
ANNA MARIA	ANMRFLXA77H								
BRADENTON BAY	BRBAFLXA75H								
ELLAS	PNLSFLXA53H								
JEN SPRINGS	SNSPFLXA37H								
DUNEDIN	DNDNFLXA73H								
LONGBOAT	LGBKFLXA38H								
WALLCRAFT	WLCRFLXA83H								
BAYOU	BAYUFLXA54H								
SULPHUR SPRINGS	SLSPFLXA93H								
NORTH GULF BEACH	NGBHFLXA39H								
SEMINOLE	SMNLFLXA23H								
LEALMAN	LLMNFLXADS0								
YBOR CITY	YBCTFLXA24H								
VENICE MAIN	VENCFLXA48H								
ENGLEWOOD	ENWDFLXA47H								
OLDSMAR	OLDSFLXA85H								
BRADENTON MAIN	BRTNFLX74H								
SKYWAY	SKWYFLXADS0								
ST. GEORGE	STGRFLXA78H								
CARROLLWOOD	CRWDFLXA96H								
SOUTHSIDE	SSDSFLXA92H								
LAKELAND MAIN	LKLDLFLXA68H								
NEW PORT RICHEY	NPRCFLXA84H								
PALMA SOLA	PLSLFLXA79H								
VENICE SOUTH	VENCFLXS0								

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VERIZON FLORIDA INC.
STATE OF FLORIDA
Unbundled Network Elements
Deaveraging Proposal Based on 2-Wire UNE Loops
Resulting Deaveraged Costs for 4-Wire and Subloop Elements

A	B	C	D	E	F	G	H	I	J
Zone 2 Wire Centers									
Wire Center Name	CLLI Code	4-Wire Avg Loop	DS-1 Loop	2-Wire Avg Feeder	4-Wire Avg Feeder	2-Wire Avg Distribution	4-Wire Avg Distribution	2-Wire Avg Drop	4-Wire Avg Drop
BRANDON	BRNDFLXA68H								
NORTHSIDE	NRSDFLXA35H								
TAMPA EAST	TAMPFLXEDS0								
TARPON SPRINGS	TRSPFLXA93H								
HIGHLANDS	HGLDFLXA64H								
SARASOTA SPRINGS	SPRGFLXA37H								
CYPRESS GARDENS	CYGRFLXA32H								
WINTER HAVEN	WNHNFLXC29H								
LUTZ	LUTZFLXA94H								
OSPREY	OSPRFLXA96H								
AUBURNDALE	ABDFLXA96H								
LAKELAND EAST	LKLDFLXE66H								
HUDSON	HDSNFLXA86H								
BARTOW MAIN	BARTFLXA53H								
ZEPHYR HILLS	ZPHYFLXA78H								
PALMETTO	PLMTFLXA72H								
WESLEY CHAPEL	WLCHFLXA97H								
ALAFIA	ALFAFLXA67H								
LAKE WALES MAIN	LKWLFLXA67H								
RUSKIN	RSKNFLXA64H								
NORTHPORT	NRPTFLXA42H								
LAKELAND NORTH	LKLDFLXN85H								
NES CITY MAIN	HNCYFLXA42H								
STONE	KYSTFLXA92H								
MULBERRY	MLBYFLXARSA								
PLANT CITY	PTCYFLXA75H								
BAYSHORE	BYSHFLXA84H								
POINCIANA	POINFLXARSA								
THONOTOSASSA	THNTFLXADS0								
WIMAUMA	WIMMFLXA63H								
MOON LAKE	MNLKFLXA85H								
HAINES CITY NORTH	HNCYFLXN424								

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VERIZON FLORIDA INC.
STATE OF FLORIDA
Unbundled Network Elements
Deaveraging Proposal Based on 2-Wire UNE Loops
Resulting Deaveraged Costs for 4-Wire and Subloop Elements

A	B	C	D	E	F	G	H	I	J
Zone 3 Wire Centers									
Wire Center Name	CLLI Code	4-Wire Avg Loop	DS-1 Loop	2-Wire Avg Feeder	4-Wire Avg Feeder	2-Wire Avg Distribution	4-Wire Avg Distribution	2-Wire Avg Drop	4-Wire Avg Drop
BABSON PARK	BBPKFLXARSA								
LAKE ALFRED	LKALFLXA95H								
DUNDEE	DUNDFLXA43H								
LAND O' LAKES	LNLKFLXA99H								
ALTURAS	ALTRFLXARSA								
PINECREST	PNCRFLXA73J								
POLK CITY	PKCYFLXARSA								
FROSTPROOF	FRSTFLXA63H								
LAKE WALES EAST	LKWLFLXERSA								
BRADLEY	BRJTFLXARSA								
PARRISH	PRSHFLXARSA								
INDIAN LAKE	INLKFLXARSA								
MYAKKA CITY	MYCYFLXA32H								

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